State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

CERTIFIED MAIL

02/16/07

02-43-00-0024
The Lubrizol Corporation
Robert J. Setele
155 Freedom Road
Painesville, OH 44077-1234

RE: Draft Title V Significant Permit Modification Chapter 3745-77 permit

Dear Robert J. Setele:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northeast District Office.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Northeast District Office
Pennsylvania

State of Ohio Environmental Protection Agency

DRAFT TITLE V SIGNIFICANT PERMIT MODIFICATION

Original Effective Date:	Expiration Date:	Modification Effective Date: ***To be entered upon final issuance***

This document constitutes issuance of a Title V significant permit modification for Facility ID: 02-43-00-0024 to:

The Lubrizol Corporation
155 Freedom Road
Painesville, OH 44077-1234

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Steam Boiler #1) Boiler	P020 (Process U) Reactor Process	P043 (Rack C/D 15) Tank Car Loading Rack
B002 (Steam Boiler #2) Boiler	P022 (Process W) Reactor Process	P044 (Rack 200 T/F West) Tank Truck Loading Rack
B003 (Steam Boiler #3) Boiler	P024 (Process Y) Reactor Process	P045 (Rack 500 T/F East) Tank Truck Loading Rack
B004 (Steam Boiler #4) Boiler	P025 (Process A) Reactor Process	P046 (Rack 700 T/F East) Tank Truck Loading Rack
B009 (Steam Boiler #9) Boiler	P026 (Process B) Reactor Process	P047 (Rack 700 T/F North) Tank Truck Loading Rack
N001 (Waste Incinerator) Waste Incinerator	P027 (Process AB) Reactor Process	P048 (Rack 800 T/F South) Tank Truck Loading Rack
P001 (Process C) Reactor Process	P028 (Process AA) Reactor Process	P049 (Rack GEN III) Tank Truck Loading Rack
P005 (Process F) Reactor Process	P029 (Process Z) Reactor Process	P050 (Process AK) Reactor Process
P006 (Process G) Reactor Process	P030 (Process AC) Reactor Process	P051 (Process AL) Reactor Process
P007 (Process H) Reactor Process	P033 (Process AF) Reactor Process	P052 (Process AM) Reactor Process
P008 (Process I) Reactor Process	P034 (Process AG) Reactor Process	P053 (Process Z1) Reactor Process
P011 (Process L) Reactor Process	P035 (Process AH) Reactor Process	P054 (Process AB1) Reactor Process
P012 (Process M) Reactor Process	P036 (Process AI) Reactor Process	P055 (Rack A/B 1-2-3) Tank Car Loading Rack
P013 (Process N) Reactor Process	P038 (Rack A/B 8) Tank Car Loading Rack	P056 (Rack A/B 6-7) Tank Car Loading Rack
P014 (Process O) Reactor Process	P039 (Rack A 11) Tank Car Loading Rack	P057 (Rack C/D 4-5) Tank Car Loading Rack
P015 (Process P) Reactor Process	P040 (Rack C/D 8-9-10) Tank Car Loading Rack	P058 (Rack Main) Tank Truck Loading Rack
P018 (Process S) Reactor Process	P041 (Rack C/D 11) Tank Car Loading Rack	P059 (Rack G60) Tank Truck Loading Rack
P019 (Process T) Reactor Process	P042 (Rack C/D 12) Tank Car Loading Rack	P060 (Rack A/B 5) Tank Car Loading Rack

P061 (Rack C/D 2-3)
Tank Car Loading Rack

P062 (Rack C 6)
Tank Car Loading Rack

P063 (Rack C/D 7)
Tank Car Loading Rack

P064 (Rack Poly Plant)
Tank Truck Loading Rack

P065 (Rack Bldg. 18 West)
Tank Truck Loading Rack

P066 (Rack 200 Ball House)
Tank Truck Loading Rack

P067 (Rack 400 Ball House)
Tank Truck Loading Rack

P068 (Rack 403 Tank)
Tank Truck Loading Rack

P069 (Rack 458 Tank)
Tank Truck Loading Rack

P070 (Rack Bldg. 5/6 East)
Tank Truck Loading Rack

P071 (Misc Bottom Loading)
Miscellaneous bottom loading of tank cars and tank trucks.

P073 (Process AN)
Reactor Process

P074 (Process AO)
Reactor Process

T013 (Storage Tank 232)
Storage Tank

T022 (Storage Tank 404)
Storage Tank

T023 (Storage Tank 405)
Storage Tank

T034 (Storage Tank 458)
Storage Tank

T073 (Storage Tank 12)
Storage Tank

T077 (Storage Tank 242)
Storage Tank

T122 (Storage Tank 465)
Storage Tank

T123 (Storage Tank 462)
Storage Tank

T136 (Storage Tank 109)
Storage Tank

T186 (Storage Tank 159)
Storage Tank

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the

magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record

keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. (“Act”); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

(Authority for term: OAC rule 3745-77-07(A)(4))

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

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.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be

construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. Chemical Accident Prevention Provisions, 40 CFR Part 68: Risk Management Programs Under the Clean Air Act, Section 112(r)(7). Chemicals covered are those regulated substances present above the threshold quantity in a process, as listed under 40 CFR 68.130 and determined under 40 CFR 68.115.

This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and is required to comply with the requirements of section 112(r) and the regulations adopted thereunder.

2. Beginning no later than May 10, 2008, the emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for total combined HAPs, as rolling, 12-month summations.

The company proposed these emission limits to avoid being classified as a major source for HAPs as defined in section 63.2 of 40 CFR Part 63 for any Maximum Achievable Control Technology (MACT) standards with an initial compliance date on or after November 10, 2006 (i.e., Miscellaneous Organic Chemical Manufacturing MACT, 40 CFR Part 63, Subpart FFFF; and the Organic Liquid Distribution (Non-Gasoline) MACT), 40 CFR Part 63, Subpart EEEE).

3. Compliance with the emission limitation for individual HAP and total combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions beginning no later than November 10, 2006, utilizing data for the previous 12 months.

4. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the information designated in sections A.5 through A.11 below for the following emissions unit categories: Combustion Units (B001, B002, B003, B004, B009, and insignificant units B006, B008); Waste Incinerator (N001): Reactor Process Vents (P001, P005, P006, P007, P008, P011, P012, P013, P014, P015, P018, P019, P020, P022, P024, P025, P026, P027, P028, P029, P030, P033, P034, P035, P036, P050, P051, P052, P053, P054, P073 and P074); Loading Operations (P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071); Storage Tanks (T013, T022, T023, T034, T048, T073, T077, T122, T123, T136, T186;

and insignificant units (T001, T002, T003, T005, T006, T007, T008, T009, T010, T011, T012, T014, T015, T016, T017, T018, T019, T020, T021, T024, T025, T026, T027, T028, T029, T030, T031, T032, T033, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T058, T059, T060, T063, T064, T071, T072, T074, T075, T076, T078, T079, T080, T081, T082, T083, T084, T085, T086, T087, T088, T089, T090, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T103, T104, T105, T106, T107, T108, T109, T110, T111, T112, T113, T114, T115, T116, T117, T118, T119, T120, T121, T124, T125, T126, T127, T128, T129, T130, T131, T132, T133, T134, T135, T136, T137, T138, T139, T140, T141, T142, T143, T144, T145, T146, T147, T148, T149, T150, T151, T152, T153, T154, T155, T156, T157, T158, T159, T160, T161, T162, T163, T164, T165, T166, T167, T168, T169, T170, T171, T172, T173, T174, T175, T176, T177, T178, T179, T180,T181, T182, T183, T184, T185, T187, T188, T189, T190,T191, T192, T193, T194, T195, T196, T197, T198, T199, T200, T201, T202, T203, T204, T205, T206, T207, T208, T209, T210, T211, T212, T213, T214, T215, T217, T218, T219, T220, T221, T222, T223, T225, T226,T227, T228, T229,T230, T231, T232, T233, T234, T235, T236, T237, T238, T239,T240, T241, T242, T243, T244, T245, Z011, Z012, Z013, Z014, Z016, Z062, Z063, Z129); and fugitive emissions from leaking components in HAP service not otherwise included in the categories above.

All other emissions units listed in the Title V permit either do not emit HAPs, or the emissions are so negligible that they cannot be reliably quantified. Total HAP emissions from these sources are presumed to be less than 0.1 tpy (the difference between the emission limitation in this permit and the major source threshold).

A. State and Federally Enforceable Section (continued)

5. HAP emissions shall be calculated as follows:

a. For storage tanks, loading operations, and reactor process vents, the permittee shall use the same calculation methodologies for determining HAP emissions as specified in this permit for determining VOC emissions, and then multiplying the VOC emissions by the weight percent HAPs present in the vapor and adjusting for the control efficiency of any emissions control system. Control efficiencies for organic HAPs shall be the same as the VOC control efficiencies determined in accordance with Title V requirements. Flares shall be assumed to have 98 percent control efficiency for organic HAPs and VOCs. See USEPA, Compilation of Air Pollutant Emission Factors (AP-42) section 13.5-4 (January 1995). Control efficiencies for inorganic HAPs (i.e., Hydrogen chloride, and halides) shall be determined by an engineering assessment. Such an engineering assessment will be completed by November 10, 2006 and submitted to the agency for review and approval. The control efficiencies so determined will be used to compute emissions for the 12 month period from November 2005 to November 2006 and thereafter. The permittee may revise the control efficiencies by submitting new information sufficient to demonstrate to the Ohio EPA Northeast District Office that another control efficiency is more representative of actual control device operating conditions. A change in a control efficiency factor shall constitute a minor modification to this permit. (See further details below.)

b. For boilers, HAP emissions shall be computed using emission factors from U.S. EPA's FIRE database based on SCC codes, and the amount of fuel burned. The permittee shall keep records of the amount of fuel burned each month for each emissions unit or category. The permittee may propose and the Ohio EPA Northeast District Office shall approve new emission factors to replace these FIRE emssion factors upon demonstrating that the new factors are more accurate and better representative of actual emissions from the relevant emissions units. A change in these emission factors shall constitute a minor modification to this permit.

c. For the Waste Incinerator (N001), HAP emissions shall be determined based on site-specific emissions factors (expressed in pounds per hour) developed from source test and continuous monitoring data multiplied by actual hours of incinerator operation each month. The current emission factors for the incinerator are:

HAP	Em. Factor	Units
Lead	0.00087300	lbs/hr burning waste
Mercury	0.00013650	lbs/hr burning waste
Arsenic	0.00005480	lbs/hr burning waste
Berylium	0.00000170	lbs/hr burning waste
Cadmium	0.00001130	lbs/hr burning waste
Chromium	0.00008650	lbs/hr burning waste
Phenol	0.00000003	lbs/hr burning waste
Naphthalene	0.00000460	lbs/hr burning waste
Chlorine	0.00100000	lbs/hr burning waste
Hydrochloric acid	0.07000000	lbs/hr burning waste

The permittee may propose and the Ohio EPA Northeast District Office shall approve new emission factors to replace these emission factors upon demonstrating that the new factors are more accurate and better representative of actual emissions from the relevant emissions units. A change in these emission factors shall constitute a minor modification to this permit.

d. Fugitive emissions of HAPs from equipment leaks shall be computed using the emission factors from "Protocol for Equipment Leak Emission Estimates" EPA-453/R-95/017 issued November 1995, or other approved alternate, and the number of pumps, valves, flanges, etc. to calculate the pounds per hour of fugitive VOC emissions, using SOCMI leak/no-leak, or ppmv screening value factors. The monthly fugitive HAP emissions (in pounds) shall be calculated by multiplying pounds per hour VOC emission rate by the percent HAPs in the fluid and multiplying the result by the monthly hours of operation of the equipment with HAPs present. If necessary, monitoring data to establish typical percent leaks or ppmv screening factors for sources in HAP service will be conducted prior to November 10, 2006, and will be used to determine emissions for the 12 month period from November 2005 to November 2006. Monitoring methods to establish leakage rates and maintenance methods are further described in section A.15 below.

A. State and Federally Enforceable Section (continued)

e. HAP emissions from other fugitive and stack sources shall be computed monthly using other Ohio EPA-approved calculation methods. These shall include ball houses, drip trays, and painting. Emissions from spills, hold tanks, charge tanks, filter cake hoppers, filters, and filter tanks, shall be included as parts of reactor processes.

The specific methodology used to calculate the HAP emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office on or before November 10, 2006. The permittee may revise the calculation methodologies by submitting methodology revisions subject to the review and approval of the Ohio EPA Northeast District Office. A change in the calculation methodology shall constitute a minor modification to this permit. Calculations of all HAP emission factors shall be kept on site and available for Ohio EPA review.

6. For reactor vents, HAP emissions shall be determined based on product-specific emission factors (expressed in pounds per batch of each product) multiplied by the number of batches of that product made in a month, to determine the pounds of HAP emitted per product per month, and summed to reflect the total emissions from all products processed in the reactors in a month. The emission factors for the reactor vents shall be computed based on the engineering calculation methods for process vents contained in the Pharmaceutical NESHAP [40 CFR Part 63.1257(d)] or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the HAP emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Calculations of all HAP emission factors shall be kept on site and available for Ohio EPA review.

Similar products may be grouped together provided that the emission factor assigned to that group reflects the highest calculated emission factor for all products in the group. For new products that require a new emission factor, the permittee shall calculate the emission factor using the method described above and submit that calculation to the Ohio EPA's Northeast District Office. The new emission factor can be used immediately to determine monthly emissions but any adjustments to the emission factor required after Ohio EPA's review must be applied retroactively to the date the new product was introduced. A change in these emission factors shall constitute a minor modification to this permit. For reactor vents, the permittee shall submit HAP emission factors for all products produced in each process emissions unit.

A. State and Federally Enforceable Section (continued)

7. For reactor process vents, the permittee shall collect and record the following information for each month:

a. the name of each hazardous air pollutant (HAP) used in or produced by the emissions unit;

b. the HAP emission rate for each HAP, before control, in pounds per month for each emissions unit, using the following equation:

E (Uncontrolled) = (amount of each HAP emitted, in pounds/month);

c. the HAP emissions for each HAP, after control, in pounds per month for each emissions unit, using the following equation:

E (Controlled) = (uncontrolled HAP emission rate, in lbs/month) x (1 - (CE/100))

where:

CE = the overall control efficiency of the emissions control system. For organic HAPs this shall be the same as the VOC control efficiency. For inorganic HAPs the control efficiency shall be determined by an engineering assessment pursuant to A.5.a (above).

d. the total individual HAP emission rate, after control (in lbs of HAP/month, determined by adding the values for each emissions unit);

e. the rolling, twelve-month summation of the monthly HAP emissions for each individual HAP (in pounds, calculated by summing the monthly HAP emissions for the preceding 11 months plus the HAP emissions for the current month for all emissions units); and

f. the total combined HAP emissions, in tons per month and tons per rolling, 12-month period (the sum of each HAP emitted in pounds divided by 2000 lbs/ton for all emissions units).

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact.

8. For loading operations, the permittee shall collect and record each month the following information:

a. the throughput of each liquid containing HAPs, in gallons;
b. the loading method for each type of liquid loaded;
c. the method of HAP destruction used for each type of liquid loaded and the estimated overall HAP control efficiency (if applicable), in percent;
d. the true vapor pressure of the liquid, in psia;
e. the molecular weight of vapors, in lb/lb-mol;
f. the bulk temperature of liquid loaded, in degrees Rankin; and
g. the weight percent of each individual HAP in the vapors.

A. State and Federally Enforceable Section (continued)

9. For loading operations, the permittee shall record every month the sum of HAP emissions (MHAP) for each individual HAP from each liquid loaded according to the following equation:

MHAP = the sum, from i=1 to i=n, of (%HAP)(LL)(MTL / 1000)(1-C)(ton/2000 lbs)

where:

%HAP = the weight% HAP in the vapors;
i = each individual liquid loaded;
n = the total number of liquids loaded;
MTL = throughput of each liquid, in gal/month; and
C = overall control efficiency of the emissions control system (for organic HAPs this shall be the same as the VOC control efficiency).

For inorganic HAPs the control efficiency shall be determined by an engineering assessment pursuant to section A.5.a (above).

LL = the loading loss, in lb/1000 gal of liquid loaded, and is calculated according to the following equation from AP-42 at 5.2-4:

LL= (12.46 SPM / T)

where:

S = saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P = true vapor pressure of the liquid, in psia;
M = molecular weight of vapors, in lb/lb-mol; and
T = bulk temperature of liquid loaded, in degrees Rankin.

10. For storage tanks containing HAPs, the permittee shall maintain monthly records documenting the following information:

a. the type of liquid stored;
b. the weight percent of each individual HAP in the vapors; and
c. the monthly throughput of liquid, in gallons.

11. For storage tanks containing HAPs, HAP emissions shall be computed using the throughput data, the storage tank dimensions, and U.S. EPA emission factors and equations found in AP-42, Section 7.1.3, "Emission Factors for Organic Liquid Storage Tanks" (September 1997), accounting for the weight percent HAPs in the vapors and adjusting for the control efficiency of any emissions control system.

12. The permittee shall maintain records for the entire facility each month of the following information:

a. the total facility-wide emissions (and associated calculations) for each individual HAP, in pounds or tons per year (calculated by summing the individual HAP emission rates from all the emissions units at the facility);

b. the total facility-wide emissions (and associated calculations) for total combined HAPs, in pounds or tons per year (calculated by summing total combined HAPs emission rates from all the emissions units at the facility);

c. the rolling, 12-month summation of the total individual HAP emissions rates for each HAP from all the emissions units at the facility, in tons; and

d. the rolling, 12-month summation of the total combined HAP emissions rates from all the emissions units at the facility, in tons.

A. State and Federally Enforceable Section (continued)

13. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the General Terms and Conditions, section A.1.c of this permit, including the following information:

a. an identification of each month during which the rolling, 12-month individual HAP emissions rate (from the facility) exceeded 9.9 tons, and the actual rolling, 12-month summation of each individual HAP emissions rate (from the facility) for each such month; and

b. an identification of each month during which the rolling, 12-month combination of all HAP emissions rates (from the facility) exceeded 24.9 tons, and the actual rolling, 12-month summation of the combination of all HAP emissions rates (from the facility) for each such month.

14. The permittee shall submit annual reports that summarize the annual emissions of the combined HAP emissions for the facility and, if the combined HAP emissions are 10 TPY or more, the annual emissions of each individual HAP. These reports shall cover the previous calendar year and shall be submitted by April 30 of each year.

15. Methodology to Monitor and Establish Fugitive Piping Leakage Rates and Maintain Equipment (as referenced in section A.5.d):

a. Calculation Methods Using SOCMI Factors :

Fugitive piping emissions shall be computed using SOCMI factors consistent with EPA document "Protocol for Equipment Leak Emission Estimates" EPA-453/R-95/017 issued November 1995. This document contains several different types of SOCMI kg/hr emission factors:

SOCMI average emission factors (Table 2-1);
SOCMI screening range emission factors (Table 2-5), with leak/no-leak factors for > vs < 10,000 ppmv TOC; and
SOCMI leak rate/screening value correlations (Table 2-9). (These use specific ppmv values.)

The appropriate SOCMI kg/hr emission factors to use for computing fugitive piping leakage rates from each source at the facility will be determined as follows:

i. Equipment Using Instrument Monitoring For Leaks:

(a) A representative sample of specific types of equipment (reactors, blend tanks, storage tanks, and filtration systems) in HAP service will be monitored prior to November 10, 2006 to measure ppmv TOC emissions from the following components: valves, flanges, pump seals, mixer seals, compressor seals, open ended lines, and pressure relief valves.

(b) The representative sample of each type of equipment shall account for at least 50 percent of potential fugitive piping HAP emissions from all such equipment "in HAP service" based on SOCMI average emission factors. (Sources "in HAP Service" are defined to contain at least 5 percent HAP for 300 hrs/year or more). The specific equipment in the representative sample may be changed as needed to continue to account for at least 50 percent of potential fugitive piping HAP emissions.

(c) For the monitored equipment, emissions will be computed based on the appropriate SOCMI leak/no-leak or ppmv factors from SOCMI Table 2-5 or 2-9.

(d) A list of the specific representative equipment to be monitored shall be supplied to the Ohio EPA Northeast District Office by the compliance date (currently November 10, 2006). This list shall also identify the approximate percent of potential fugitive piping HAP emissions accounted for by the representative equipment.

A. State and Federally Enforceable Section (continued)

(e) The ppm TOC values measured for the representative equipment shall be used to determine the percentage of components of each type that are "leaking". (Component types would include valves, flanges, pump seals, etc. in light liquid, heavy liquid, or gas service.) (Components showing 10,000 ppmv TOC or more would be defined as "leaking" for the purposes of applying SOCMI leak or no-leak factors from Table 2-5). The percent "leaking" data for each type of component determined from representative equipment monitoring data may be used to estimate the percent of such sources that are leaking for other equipment that was not monitored.

ii. Equipment Not Using Instrument Monitoring For Leaks:

(a) If the vapor pressure of the fluid is less than 0.147 psia at processing temperatures, fugitive emissions will be estimated using SOCMI no-leak factors from Table 2-5. (Texas Natural Resources Conservation Commission document "Air Permit Technical Guidance for Chemical Sources: Equipment Leak Fugitives", dated October 2000, states that the theoretical saturation concentration as ppmv TOC can not exceed 10,000 if the fluid vapor pressure is less than 0.147 psia.)

(b) If the vapor pressure of the fluid is greater than or equal to 0.147 psia at processing temperatures, fugitive emissions will be estimated based on the percent "leaking" data for each type of component from representative equipment monitoring, and the appropriate SOCMI leak/no-leak factors from Table 2-5.

(c) The number of each type of component (valves, flanges, pump seals, mixer seals, compressor seals, open ended lines, and pressure relief valves) associated with unmonitored equipment can be estimated based on the average number of such components for the representative equipment.

(d) Fugitive piping HAP emissions will be computed for reactors, blend tanks, storage tanks, and filtration systems containing liquids with 0.1 percent or more of any individual HAP based on Material Safety Data Sheet information.

b. Continuous Compliance Assurance Monitoring and Maintenance Methods:

i. The representative equipment will be monitored for ppmv TOC values yearly. Any components found to have >1000 ppmv TOC will be repaired. A reasonable effort will be made to complete repairs within 15 days.

ii. All storage tanks in HAP service, and their associated pumps and piping, shall be inspected monthly for leaks by audio, olfactory, and visual checks. A reasonable effort will be made to repair any leaks found within 15 days. During time periods when a component source was known to be leaking, emissions for the component shall be computed using the SOCMI factors for > 10,000 ppmv TOC unless ppmv data is available. If the sensory checks detect a leak, the permittee may choose to measure the ppmv TOC using a properly calibrated monitoring instrument, and compute emissions using the SOCMI emission factors most appropriate to the size of the leak.

iii. All reactor system tanks in continuous HAP service, and their associated pumps and piping, shall be inspected monthly for leaks by audio, olfactory, and visual checks. A reasonable effort will be made to repair any leaks found within 15 days. During time periods when a component source was known to be leaking, emissions for the component shall be computed using the SOCMI factors for > 10,000 ppmv TOC unless ppmv data is available. If the sensory checks detect a leak, the permittee may choose to measure the ppmv TOC using a properly calibrated monitoring instrument, and compute emissions using the SOCMI emission factors most appropriate to the size of the leak.

iv. Reactor system tanks in non-continuous HAP service making products containing 5 percent or more HAPs, and their associated pumps and piping, shall be inspected for leaks by audio, olfactory, and visual checks. Such inspections shall be made monthly, or per batch if such products are made less frequently than monthly. A reasonable effort will be made to repair any leaks found within 15 days. During time periods when a component source was known to be leaking, emissions for the component shall be computed using the SOCMI factors for > 10,000 ppmv TOC unless ppmv data is available. If the sensory checks detect a leak, the permittee may choose to measure the ppmv TOC using a properly calibrated monitoring instrument, and compute emissions using the SOCMI emission factors most appropriate to the size of the leak.

A. State and Federally Enforceable Section (continued)

c. Record Keeping Requirements:

For fugitive emissions of HAPs from equipment leaks, the permittee shall collect and record the following information:

i. Monthly Records:

(a) the name of each fluid containing HAPs in the equipment;
(b) the type of fluid (light liquid, heavy liquid, or vapor);
(c) the hours that the fluid was present in the equipment;
(d) the vapor pressure of the fluid in the equipment, in psia;
(e) the lb/hr leakage rate for the equipment based on the appropriate SOCMI emission factors;
(f) the weight% of each individual HAP in the leaks;
(g) records of audio, olfactory, visual or instrument checks of equipment in HAP service inspected monthly; and
(h) dates when components were found to be leaking, and date when repaired.

ii. Annual Records:

(a) ppmv TOC readings for representative equipment components;
(b) the identification of each representative equipment component;
(c) dates when representative equipment components were found to be leaking, and date when repaired; and
(d) the percent of each type of component for the representative equipment found to be "leaking" per SOCMI Table 2-5 (>10,000 ppmv TOC).

iii. Batch Records:

(a) records of audio, olfactory, visual or instrument checks of equipment in HAP service inspected each batch; and
(b) dates when components were found to be leaking, and date when repaired.

16. The following requirements apply to emissions unit B009:

40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart DDDDD

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 10 of 40 CFR Part 63, Subpart DDDDD

Parts 63.1, 63.2, 63.3, 63.4, 63.5, 63.6(a), 63.6(b)(1)-(4), 63.6(b)(5), 63.6(b)(6), 63.6(b)(7), 63.6(c)(1)-(2), 63.6(c)(3)-(4), 63.6(c)(5), 63.6(d), 63.6(e)(1)-(2), 63.6(e)(3), 63.6(f)(1), 63.6(f)(2)-(3), 63.6 (g)(1)-(3), 63.6(h)(1), 63.6(h)(2)(ii), 63.6(h)(2)(iii), 63.6(h)(3), 63.6(h)(7)(i), 63.6(h)(7)(iii), 63.6(h)(7)(iv), 63.6(h)(7)(v), 63.6 (h)(8), 63.6 (h)(9), 63.6(i)(1)-(14), 63.6(j), 63.7(a)(1), 63.7(a)(2), 63.7(a)(2)(ii-viii), 63.7(a)(2)(ix), 63.7(a)(3), 63.7(b)(2), 63.7(c), 63.7(d), 63.7(e)(1) [in part, see table], 63.7(e)(2), 63.7(e)(3), 63.7(e)(4), 63.7(f), 63.7(g), 63.7(h), 63.8(a)(1), 63.8(a)(2), 63.8(a)(3), 63.8(b)(1)(i)-(ii), 63.8(b)(2)-(3), 63.8(c)(1), 63.8(c)(1)(i), 63.8(c)(1)(ii), 63.8(c)(1)(iii), 63.8(c)(2)-(3), 63.8(c)(4)(i), 63.8(c)(5), 63.8(c)(7)-(8), 63.8(d), 63.8(e), 63.8(f)(1)-(5), 63.8(g)(1)-(4), 63.9(a), 63.9(b)(1)-(5), 63.9(c), 63.9(d), 63.9(g), 63.9(h)(1)-(6), 63.9(i), 63.9(j), 63.10(a), 63.10(b)(1), 63.10(b)(2)(i)-(v), 63.10(b)(2)(vi) and (x-xi), 63.10(b)(2)(vii)-(ix), 63.10(b)(2)(xii), 63.10(b)(2)(xiv), 63.10(b)(3), 63.10(c)(1),(5)-(8),(10)-(15), 63.10(d)(1), 63.10(d)(2), 63.10(d)(3), 63.10(d)(4), 63.10(d)(5), 63.10(e)(1)-(2), 63.10(e)(4), 63.10(f), 63.12, 63.13, 63.14, 63.15.

A. State and Federally Enforceable Section (continued)

17. The following insignificant emissions units are located at this facility:

T053 - Storage Tank 713 (PTI 02-709);
T054 - Storage Tank 715 (PTI 02-709);
T055 - Storage Tank 711 (PTI 02-709);
T056 - Storage Tank 712 (PTI 02-709);
T058 - Storage Tank 618 (PTI 02-9822);
T059 - Storage Tank 620 (PTI 02-9822);
T060 - Storage Tank 640 (PTI 02-9822);
T071 - Storage Tank 639 (PTI 02-9822);
T072 - Storage Tank 638 (PTI 02-9822);
T128 - Storage Tank 554 (PTI 02-9822);
T129 - Storage Tank 555 (PTI 02-9822);
T130 - Storage Tank 556 (PTI 02-9822);
T178 - Storage Tank B-11 (PTI 02-6628);
T179 - Storage Tks WTG-1 (PTI 02-6934);
T182 - Storage Tank 102 (PTI 02-7805);
T183 - Storage Tank 111 (PTI 02-7805);
T184 - Storage Tank 114 (PTI 02-7805);
T185 - Storage Tank 152 (PTI 02-7805);
T187 - Storage Tank 160 (PTI 02-7805);
T188 - Storage Tank 168 (PTI 02-7805);
T189 - Storage Tank 228 (PTI 02-7805);
T190 - Storage Tank 229 (PTI 02-7805);
T191 - Storage Tank 230 (PTI 02-7805);
T192 - Storage Tank 237 (PTI 02-7805);
T193 - Storage Tank 413 (PTI 02-7805);
T195 - Storage Tank 516 (PTI 02-7805);
T196 - Storage Tank 517 (PTI 02-7805);
T197 - Storage Tank 518 (PTI 02-7805);
T198 - Storage Tank 519 (PTI 02-7805);
T199 - Storage Tank 557 (PTI 02-7805);
T200 - Storage Tank 558 (PTI 02-7805);
T201 - Storage Tank 573 (PTI 02-7805);
T202 - Storage Tank 574 (PTI 02-7805);
T203 - Storage Tank 577 (PTI 02-7805);
T204 - Storage Tank 578 (PTI 02-7805);
T206 - Storage Tank 594 (PTI 02-7805);
T207 - Storage Tank 595 (PTI 02-7805);
T210 - Storage Tank 599 (PTI 02-7805);
T211 - Storage Tank 718 (PTI 02-7805);
T214 - Storage Tank 130 (PTI 02-7801);
T222 - Storage Tank 514 (PTI 02-9822);
T223 - Storage Tank 515 (PTI 02-9822);
T238 - Storage Tank 619 (PTI 02-8891);
T240 - Storage Tank 31 (PTI 02-9386);
T242 - Storage Tank D32 (PTI 02-14363);
T243 - Storage Tank D38 (PTI 02-14363);
T244 - Storage Tank 25 (PTI 02-16763); and
T245 - Storage Tank 428 (PTI 02-19012).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B. State Only Enforceable Section

1. B006 - Boiler A-1;
B008 - Boiler D-12;
B011 - Boiler J-60;
B015 - Computer Back-up Generator (diesel);
B016 - 331 Generator #1;
B017 - 331 Generator #2;
B018 - 331 Generator #3;
B019 - 332 Generator;
B020 - 333 Generator;
B021 - QA Generator;
B022 - 105 tk Water Pump;
P072 - Open Burning;
T001 - Storage Tank 9;
T002 - Storage Tank 10;
T003 - Storage Tank 11;
T005 - Storage Tank 101;
T006 - Storage Tank 221;
T007 - Storage Tank 222;
T008 - Storage Tank 223;
T009 - Storage Tank 224;
T010 - Storage Tank 225;
T011 - Storage Tank 226;
T012 - Storage Tank 231;
T014 - Storage Tank 233;
T015 - Storage Tank 234;
T016 - Storage Tank 235;
T017 - Storage Tank 236;
T018 - Storage Tank 310;
T019 - Storage Tank 401;
T020 - Storage Tank 402;
T021 - Storage Tank 403;
T024 - Storage Tank 441;
T025 - Storage Tank 442;
T026 - Storage Tank 443;
T027 - Storage Tank 444;
T028 - Storage Tank 445;
T029 - Storage Tank 446;
T030 - Storage Tank 447;
T031 - Storage Tank 450;
T032 - Storage Tank 456;
T033 - Storage Tank 457;
T035 - Storage Tank 481;
T036 - Storage Tank 482;
T037 - Storage Tank 484;
T038 - Storage Tank W-33;
T039 - Storage Tank W-34;
T040 - Storage Tank 455;
T041 - Storage Tank 483;
T042 - Storage Tank 448;
T043 - Storage Tank 311;
T044 - Storage Tank 312;
T045 - Storage Tank 660;
T046 - Storage Tank 651;
T047 - Storage Tank 650;
T048 - Storage Tank 801;
T049 - Storage Tank 802;
T050 - Storage Tank 803;
T051 - Storage Tank 804;
T052 - Storage Tank M-80;
T063 - Storage Tank 313;
T064 - Storage Tank 805;

T064 - Storage Tank 805;

B. State Only Enforceable Section

T074 - Storage Tank 8;
T075 - Storage Tank 240;
T076 - Storage Tank 241;
T078 - Storage Tank 243;
T079 - Storage Tank 244;
T080 - Storage Tank 714;
T081 - Storage Tank 716;
T082 - Storage Tank 717;
T083 - Storage Tank 15;
T084 - Storage Tank 17;
T085 - Storage Tank 19;
T086 - Storage Tank 20;
T087 - Storage Tank 21;
T088 - Storage Tank 23;
T089 - Storage Tank 104;
T090 - Storage Tank 121;
T092 - Storage Tank 142;
T093 - Storage Tank 150;
T094 - Storage Tank 202;
T095 - Storage Tank 203;
T096 - Storage Tank 207;
T097 - Storage Tank 208;
T098 - Storage Tank 213;
T100 - Storage Tank 212;
T101 - Storage Tank 215;
T102 - Storage Tank 216;
T103 - Storage Tank 217;
T104 - Storage Tank 218;
T105 - Storage Tank 219;
T106 - Storage Tank 410;
T107 - Storage Tank 414;
T108 - Storage Tank 418;
T109 - Storage Tank 420;
T110 - Storage Tank 421;
T111 - Storage Tank 425;
T112 - Storage Tank 426;
T113 - Storage Tank 427;
T114 - Storage Tank 430;
T115 - Storage Tank 431;
T116 - Storage Tank 432;
T117 - Storage Tank 433;
T118 - Storage Tank 434;
T119 - Storage Tank 460;
T120 - Storage Tank 461;
T121 - Storage Tank 154 (466);
T124 - Storage Tank 155 (468);
T125 - Storage Tank 469;
T126 - Storage Tank 470;
T127 - Storage Tank 480;
T131 - Storage Tank 13;
T132 - Storage Tank 16;
T133 - Storage Tank 24;
T134 - Storage Tank 107;
T135 - Storage Tank 108;
T137 - Storage Tank 112;
T138 - Storage Tank 118;
T139 - Storage Tank 120;
T140 - Storage Tank 122;
T141 - Storage Tank 123;
T142 - Storage Tank 140;

B. Only Enforceable Section

T143 - Storage Tank 147;
T144 - Storage Tank 148;
T145 - Storage Tank 149;
T146 - Storage Tank 153;
T147 - Storage Tank 201;
T148 - Storage Tank 204;
T149 - Storage Tank 205;
T150 - Storage Tank 206;
T151 - Storage Tank 209;
T152 - Storage Tank 214;
T153 - Storage Tank 220;
T154 - Storage Tank 227;
T155 - Storage Tank 409;
T156 - Storage Tank 411;
T157 - Storage Tank 412;
T158 - Storage Tank 416;
T159 - Storage Tank 417;
T160 - Storage Tank 419;
T161 - Storage Tank 422;
T162 - Storage Tank 423;
T163 - Storage Tank 424;
T164 - Storage Tank 428;
T165 - Storage Tank 429;
T166 - Storage Tank 436;
T167 - Storage Tank 437;
T168 - Storage Tank 463;
T169 - Storage Tank 464;
T170 - Storage Tank 169 (467);
T171 - Storage Tank 596;
T172 - Storage Tank 110;
T173 - Storage Tank 158;
T174 - Storage Tank 211;
T175 - Storage Tank 702;
T176 - Storage Tank 703;
T177 - Storage Tank 134;
T180 - Storage Tank 2;
T181 - Storage Tank 3;
T208 - Storage Tank 597;
T209 - Storage Tank 598;
T212 - Storage Tank A-38;
T213 - Storage Tank G-60;
T215 - Storage Tank 18;
T217 - Storage Tank 301;
T218 - Storage Tank 302;
T219 - Storage Tank 303;
T220 - Storage Tank 304;
T221 - Storage Tank 415;
T225 - Storage Tank A-27;
T226 - Storage Tank A-31;
T227 - Storage Tank A-32;
T228 - Storage Tank A-33;
T229 - Storage Tank A-34;
T230 - Storage Tank A-35;
T231 - Storage Tank A-36;
T232 - Storage Tank B-1;
T233 - Storage Tank B-2;
T234 - Storage Tank D-100;
T235 - Storage Tank G-17;
T236 - Storage Tank J-15;
T237 - Storage Tank E-75;
T239 - Storage Tank 22;

B. State Only Enforceable Section (continued)

T241 - Storage Tank 806;
Z010 - W-5 Tank;
Z011 - 339 Drip Trays;
Z012 - 400 Ball House;
Z013 - Painting;
Z014 - 200 Ball House;
Z015 - Process Sewer;
Z016 - 500 Ball House;
Z021 - Car Cleaning Tank;
Z022 - Car Cleaning Pit;
Z023 - Car Cleaning Vapors;
Z024 - Drum Sump;
Z025 - Cold Cleaner #1;
Z026 - Cold Cleaner #2;
Z027 - Cold Cleaner #3;
Z028 - W-1 Tank;
Z029 - 332-S Drum Heating;
Z030 - 332-N Drum Heating;
Z031 - 334 Drum Heating;
Z032 - Gasoline Storage;
Z039 - Port. Generator #1;
Z040 - Port. Generator #2;
Z041 - Port. Generator #3;
Z042 - Port. Generator #4;
Z043 - Port. Pump #1;
Z044 - Port. Pump #2;
Z045 - Port. Pump #3;
Z046 - Port. Pump #4;
Z049 - 331 Tank Flushing;
Z050 - 332 Tank Flushing;
Z051 - 333 Tank Flushing;
Z052 - 334 Tank Flushing;
Z053 - 336 Tank Flushing;
Z054 - 339 Tank Flushing;
Z055 - Bldg. 13 Cleaner;
Z056 - QA Lab;
Z057 - Paved Roadways;
Z058 - Unpaved Roadways;
Z060 - 534A Tank;
Z061 - 534B Tank;
Z062 - B-5 Tank;
Z063 - B-6 Tank;
Z118 - Cooling Tower North;
Z119 - Cooling Tower South;
Z120 - Cooling Tower West;
Z121 - Degreaser VD2;
Z122 - Heater Admin;
Z123 - Heater Locker Rm;
Z124 - Heater Maintenance;
Z125 - Heater QA;
Z126 - Heater Receiving;
Z127 - H2O deareator;
Z128 - H2O hot lime softener;
Z129 - Storage Tank 31; and

Z130 - Storage Tank C60.

B. State Only Enforceable Section (continued)

The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Steam Boiler #1 (B001)

Activity Description: Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Steam Boiler #1 (B001): Erie City natural gas or #2 fuel oil fired boiler rated at 41 mmBTU per hour.	OAC rule 3745-17-07(A)(1)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	See section A.I.2.b below.
	OAC rule 3745-18-06(D)	See section A.I.2.c below.

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

2.b Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

2.c Sulfur dioxide emissions shall not exceed 1.6 pounds per million Btu of actual heat input.

2.d As used in the terms and conditions for this emissions unit, "number two fuel oil" and/or "oil" includes number two fuel oil blends and diesel fuel blends, containing water and additives.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall have a sulfur and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide per million Btu of actual heat input.

Compliance with the above-mentioned specifications shall be determined using the analytical results provided by the permittee or oil supplier for each shipment of oil.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in lbs/mmBtu.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (lbs/mmBtu) for each shipment of oil.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the oil shipments received during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation: Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

1.c Emission Limitation: 1.6 pounds of sulfur dioxide emissions per million Btu actual heat input.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping in section A.III.2 using the following equation specified in OAC rule 3745-18-04(F)(2) for each shipment of oil:

E (lb/mmBtu) = [(1 x 10^6) / H] x D x S x 1.974

where:

E = SO2 emission rate, in lbs/mmBtu;
H = heat content of the liquid fuel, in Btu/gal;
D = density of the liquid fuel, in lbs/gal; and
S = decimal fraction of sulfur in the liquid fuel.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

2. If required, the permittee shall conduct, or have conducted, SO2 emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 1.6 lbs/mmBtu actual heat input in accordance with the following requirements:

Compliance with the allowable mass emission rate for SO2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C and the procedures in OAC rule 3745-18-04.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Steam Boiler #2 (B002)

Activity Description: Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Steam Boiler #2 (B002): Erie City natural gas or #2 fuel oil fired boiler rated at 41 mmBTU per hour.	OAC rule 3745-17-07(A)(1)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	See section A.I.2.b below.
	OAC rule 3745-18-06(D)	See section A.I.2.c below.

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

2.b Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

2.c Sulfur dioxide emissions shall not exceed 1.6 pounds per million Btu of actual heat input.

2.d As used in the terms and conditions for this emissions unit, "number two fuel oil" and/or "oil" includes number two fuel oil blends and diesel fuel blends, containing water and additives.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall have a sulfur and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide per million Btu of actual heat input.

Compliance with the above-mentioned specifications shall be determined using the analytical results provided by the permittee or oil supplier for each shipment of oil.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in lbs/mmBtu.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (lbs/mmBtu) for each shipment of oil.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the oil shipments received during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation: Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

1.c Emission Limitation: 1.6 pounds of sulfur dioxide emissions per million Btu actual heat input.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping in section A.III.2 using the following equation specified in OAC rule 3745-18-04(F)(2) for each shipment of oil:

E (lb/mmBtu) = [(1 x 10^6) / H] x D x S x 1.974

where:

E = SO2 emission rate, in lbs/mmBtu;
H = heat content of the liquid fuel, in Btu/gal;
D = density of the liquid fuel, in lbs/gal; and
S = decimal fraction of sulfur in the liquid fuel.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

2. If required, the permittee shall conduct, or have conducted, SO2 emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 1.6 lbs/mmBtu actual heat input in accordance with the following requirements:

Compliance with the allowable mass emission rate for SO2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6Cand the procedures in OAC rule 3745-18-04.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Steam Boiler #3 (B003)

Activity Description: Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Steam Boiler #3 (B003): 41 mmBtu per hour Erie City natural gas or #2 fuel oil-fired boiler, modified to burn on-site generated used fuel oil as a backup fuel	OAC rule 3745-31-05(A)(3) (PTI 02-19897)	particulate emissions (PE): 10.7 lbs/hour and 46.7 tons/year, based upon an allowable emissions rate of 0.26 lb per million Btu of actual heat input, as specified by Curve P-1 of "Figure I" in OAC rule 3745-17-10(C)(1) sulfur dioxide (SO2) emissions: 65.6 lbs/hour and 287 tons/year, based upon an allowable emissions rate of 1.6 lbs per million Btu of actual heat input, as established in OAC rule 3745-18-06(D) nitrogen oxides (NOx) emissions: 9.27 lbs/hour and 40.6 tons/year carbon monoxide (CO) emissions: 3.38 lbs/hr and 14.8 tons/year
	OAC rule 3745-17-07(A)(1)	See section A.I.2.a below.
	OAC rule 3745-17-10(C)(1)	The requirements established in this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(D)	The requirements established in this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas, number two fuel oil, and/or on-site generated used fuel oil in this emissions unit.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(A)(1)]

2. The quality of the number two and on-site generated used fuel oil burned in this emissions unit shall have a sulfur and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds per million Btu of actual heat input.

Compliance with the above-mentioned specifications shall be determined using the analytical results provided by the permittee or oil supplier for each shipment of oil.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(A)(1)]

3. All on-site generated used fuel oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Concentration
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	50 ppm, maximum*
total halogens	4000 ppm, maximum**
mercury	1 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

*If the permittee is burning used oil with any quantifiable levels of PCB's (>2 ppm and <50 ppm), then the permittee is subject to any applicable requirements found under 40 CFR Part 279, Subparts G and H, and 40 CFR 761.20(e).

**Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10(b)(1)(ii) and OAC rule 3745-279-10(B)(1)(b). Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the used oil burner has demonstrated the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-63.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(A)(1)]

4. The permittee may not burn any used oil which does not meet the specifications listed in OAC rule 3745-279-11 without first obtaining an air permit to install that authorizes the burning of such used oil. The burning of used oil that does not meet specifications listed in OAC rule 3745-279-11 is then subject to OAC rule 279-60 through 67 and the applicable portions of 40 CFR Part 761. In addition, if the permittee is burning used oil which exceeds the mercury limitation and falls below the heat content limitation listed in section A.II.3 of this permit, then this may trigger the requirement to apply for and obtain an air permit to install.

[Authority for term: PTI 02-19897, OAC rule 3745-77-07(A)(1), OAC chapter 3745-279, and 40 CFR, Part 761]

5. The burning of hazardous waste is prohibited without first complying with all applicable State and federal hazardous waste and air regulations and permits.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of number two and on-site generated used fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in lbs/mmBtu.

[Authority for term: PTI 02-19897, OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

2. The permittee shall obtain a chemical analysis of each shipment of on-site generated used oil to be burned in this emissions unit. The analysis shall identify the following information:

a. the Btu value of the used oil, in Btu/gallon;

b. the flash point of the used oil, in degrees F;

c. the arsenic content, in ppm;

d. the cadmium content, in ppm;

e. the chromium content, in ppm;

f. the lead content, in ppm;

g. the PCB content, in ppm;

h. the total halogen content, in ppm; and

i. the mercury content, in ppm.

Each analysis shall be kept in a readily accessible location for at least five years and shall be subject to the review and approval by the Ohio EPA Northeast District Office.

[Authority for term: PTI 02-19897, OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

3. The permittee shall collect, or require the oil supplier to collect, a representative grab sample for each shipment of number two fuel oil and on-site generated used fuel oil received for burning in this emissions unit. The permittee shall perform, or require the supplier to perform, analysis for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

[Authority for term: PTI 02-19897, OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

4. The permittee shall maintain annual records of the amount of natural gas, number two fuel oil, and on-site generated used fuel oil used by this emissions unit (in standard cubic feet or gallons).

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of number two fuel oil and on-site generated used fuel oil which is received for burning in this emissions unit. The permittee's or oil supplier's analysis shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of number two fuel oil and on-site generated used fuel oil received (gallons); and

b. the calculated sulfur dioxide emission rate (lbs/mmBtu) for each shipment of oil.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the oil shipments received during the previous calender quarters.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the USEPA and the Ohio EPA, within thirty days after the exceedance occurs, if any of the on-site generated used fuel oil exceeds the used oil specifications found in OAC rule 3745-279-11 and the applicable portions of 40 CFR Part 761, and shall also notify Ohio EPA if any on-site generated used oil exceeds the mercury limitation and falls below the heat content limitation listed in section A.II.3 of this permit. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11 and the applicable portions of 40 CFR Part 761, the permittee is subject to that rule and must comply with all applicable provisions of the rule(s).

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit an annual report which summarizes the annual amount of natural gas, number two fuel oil, and on-site generated used fuel oil used in this emissions unit (in standard cubic feet or gallons). This report shall be submitted by January 31 of each year for operations during the previous calendar year.

Note: this annual reporting of fuel usage may be satisfied by including the past 12 month fuel usage in the quarterly deviation (excursion) report.

[Authority for term: PTI 02-19897 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: PTI 02-19897, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation: 0.26 lb of PE per million Btu of actual heat input (10.7 lbs/hour and 46.7 tons/year)

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (10.7 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-19897, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

1.c Emission Limitation: 1.6 lbs of SO2 emissions per million Btu of actual heat input (65.6 lbs/hour and 287 tons/year)

Applicable Compliance Method: Compliance shall be determined based upon the record keeping requirements specified in section A.III.1 using the following equation specified in OAC rule 3745-18-04(F)(2) for each shipment of number two and on-site generated used fuel oil:

E (lb/mmBtu) = (1 x 10^6) / H x D x S x 1.974

where:

E = SO2 emission rate, in lb/mmBtu;
H = heat content of the liquid fuel, in Btu/gal;
D = density of the liquid fuel, in lbs/gal; and
S = decimal fraction of sulfur in the liquid fuel.

The tpy emission limitation was developed by multiplying the short-term allowable SO2 limitation (65.6 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-19897, OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

1.d Emission Limitation: 9.27 lbs/hour and 40.6 tons/year NOx

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 7, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

The tpy emission limitation was developed by multiplying the short-term allowable NOx limitation (9.27 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-19897, OAC rule 3745-15-04(C), OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emission Limitation: 3.38 lbs/hour and 14.8 tons/year CO

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 10, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

The tpy emission limitation was developed by multiplying the short-term allowable CO limitation (3.38 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-19897, OAC rule 3745-15-04(C), OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Steam Boiler #4 (B004)

Activity Description: Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Steam Boiler #4 (B004): Erie City natural gas or #2 fuel oil fired boiler rate at 81 mmBTU per hour.	OAC rule 3745-31-05(A)(3) (PTI 02-862)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1) and 3745-18-06(D).
	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	See section A.I.2.b below.
	OAC rule 3745-18-06(D)	See section A.I.2.c below.

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2.b Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

2.c Sulfur dioxide emissions shall not exceed 1.6 pounds per million Btu of actual heat input.

2.d As used in the terms and conditions for this emissions unit, "number two fuel oil" and/or "oil" includes number two fuel oil blends and diesel fuel blends, containing water and additives.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The quality of the oil burned in this emissions unit shall have a sulfur and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide per million Btu of actual heat input.

Compliance with the above-mentioned specifications shall be determined using the analytical results provided by the permittee or oil supplier for each shipment of oil.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in lbs/mmBtu.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(3), and OAC rule 3745-18-04(F)]

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (lbs/mmBtu) for each shipment of oil.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the oil shipments received during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

1.b Emission Limitation: Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

1.c Emission Limitation: 1.6 pounds of sulfur dioxide emissions per million Btu actual heat input.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping in Section A.III.2 using the following equation specified in OAC rule 3745-18-04(F)(2) for each shipment of oil:

E (lb/mmBtu) = [(1 x 10^6) / H] x D x S x 1.974

where:

E = SO2 emission rate, in lbs/mmBtu;
H = heat content of the liquid fuel, in Btu/gal;
D = density of the liquid fuel, in lbs/gal; and
S = decimal fraction of sulfur in the liquid fuel.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

2. If required, the permittee shall conduct, or have conducted, SO2 emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 1.6 lbs/mmBtu actual heat input in accordance with the following requirements:

Compliance with the allowable mass emission rate for SO2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C and the procedures in OAC rule 3745-18-04.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Steam Boiler #9 (B009)

Activity Description: Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
18 mmBtu per hour natural gas fired boiler	OAC rule 3745-31-05(A)(3) (PTI 02-18165)	1.76 lbs/hour and 7.73 tons/year of nitrogen oxides (NOx) 1.48 lbs/hour and 6.49 tons/year of carbon monoxide (CO) The requirements of this rule also include the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-10(B)(1).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
	40 CFR Part 63, Subpart DDDDD	400 ppm by volume of CO on a dry basis corrected to 3 percent oxygen See section A.I.2.a below.

2. Additional Terms and Conditions

2.a The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain annual records of the amount of natural gas used by this emissions unit in standard cubic feet (scf).

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report that summarizes the following information:

a. the annual amount of natural gas used in this emissions unit in scf; and

b. the total annual emissions of NOx, CO and PE from this emissions unit for the previous calendar year.

This report shall be submitted by January 31 of each year for operations during the previous calendar year.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation:
1.76 lbs/hr and 7.73 tons/yr of NOx

Applicable Compliance Method:
Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum input capacity of the gas burners.

E(NOx) = (18 mm Btu/hr) x [(100 lbs/106 scf)/(1,020 Btu/scf)] = 1.76 lbs/hour

Annual emissions are determined by multiplying the emission factor (100 lb/mm cu ft) by the annual natural gas usage (in scf) and dividing by 2000 lbs/ton.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:
1.48 lbs/hr and 6.49 tons/yr of CO

Applicable Compliance Method:
Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum input capacity of the gas burners.

E(CO) = (18 mm Btu/hr.) x [(84 lbs/106 scf)/(1,020 Btu/scf)] = 1.48 lbs CO per hour

Annual emissions are determined by multiplying the emission factor (84 lb/106 scf) by the annual natural gas usage (in scf) and dividing by 2000 lbs/ton.

[Authority for term: PTI 02-18165 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: PTI 02-18165, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

1.d Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: PTI 02-18165, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

1.e Emission Limitation:
400 ppm by volume of CO on a dry basis corrected to 3 percent oxygen

Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing methods and procedures specified in section A.V.2.

[Authority for term: PTI 02-18165, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

2. Pursuant to section 63.7515(e) of 40 CFR Part 63, the permittee shall conduct annual performance stack emissions tests for this emissions unit using Method 10, 10A or 10B of 40 CFR Part 60, Appendix A. Each required annual performance stack emissions test must be conducted between 10 and 12 months after the previous performance test.

Pursuant to section 63.7545(d) of 40 CFR Part 63, the permittee is required to submit a Notification of Intent to conduct a performance stack emissions test at least 30 days prior to the performance stack emissions test is scheduled to begin. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the fields office(s) refusal to accept the emissions test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

Pursuant to section 63.7515(g) of 40 CFR Part 63, a comprehensive written report on the results of the emission test(s) shall be submitted within 60 days following completion of the test(s).

[Authority for term: PTI 02-18165, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Waste Incinerator (N001)

Activity Description: Waste Incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Waste heat recovery incinerator (N001): rated capacity of 5,500.00 pounds per hour. Combustible waste consists of waste oil and process by-products. Particulate emissions are controlled by a fabric filter baghouse (WHRI BagH). HCl and SO2 emissions are controlled by a wet caustic scrubber (WHRI CScrb).	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-09	Particulate emissions shall not exceed 0.10 pound per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged.
	OAC rule 3745-18-06(E)	SO2: 39.4 lbs/hour [per 18-06(E)(1) equation]
	40 CFR Part 63, Subpart EEE (MACT for Hazardous Waste Combustors)	See sections A.2.a through A.2.e, A.II.1 through A.II.11, A.III.1 through A.III.9, A.IV.1 through A.IV.14, A.V.2 and A.V.3.

2. Additional Terms and Conditions

2.a 40 CFR §63.1203(a): Emission Standards and Operating Limits For Hazardous Waste Incinerators.

The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

i. Emissions of metals shall be controlled by limiting their feed rates as follows:

(a) The feed rate of mercury shall not exceed 0.0014 pounds per hour as a 12 hour rolling average.

(b) The feed rate of lead and cadmium combined shall not exceed 0.89 pounds per hour as a 12 hour rolling average.

(c) The feed rate of arsenic, beryllium and chromium combined shall not exceed 13.4 pounds per hour as a 12 hour rolling average

ii. Other pollutants shall be controlled as follows:

(a) The feed rate of chlorine shall not exceed 29 pounds per hour as a 12 hour rolling average.

(b) The total ash feed rate shall not exceed 443 pounds per hour as a 12 hour rolling average.

2.b 40 CFR §63.1203(a): continued.

The permittee shall comply with the following emission limits, or as established in the final rule after its compliance date, whichever are currently applicable:

i. Emission limits for existing sources. You must not discharge or cause combustion gases to be emitted into the atmosphere that contain:

(a) For dioxins and furans: Emissions in excess of 0.20 ng TEQ/dscm corrected to 7 percent oxygen.

(b) Mercury in excess of 130 g/dscm corrected to 7 percent oxygen.

(c) Lead and cadmium in excess of 240 g/dscm* combined emissions per the interim standard, corrected to 7 percent oxygen (*expected to change to 230 g/dscm in the final MACT standard, unless otherwise specified in the latest revision to the MACT).

(d) Arsenic, beryllium, and chromium in excess of 97 g/dscm* combined emissions per the interim standard, corrected to 7 percent oxygen (*expected to change to 92 g/dscm in the final MACT standard, unless otherwise specified in the latest revision to the MACT).

(e) For carbon monoxide:

(i) Carbon monoxide in excess of 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen. If the permittee elects to comply with this carbon monoxide standard rather than the hydrocarbon standard under paragraph (a)(5)(ii) of §63.1203, the permittee must also document that, during the destruction and removal efficiency (DRE) test runs or their equivalent as provided by §63.1206(b)(7), hydrocarbons do not exceed 10 parts per million by volume during those runs, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane.

2. Additional Terms and Conditions (continued)

(f) Hydrochloric acid and chlorine gas in excess of 77 parts per million* by volume, combined emissions per the interim standard, expressed as hydrochloric acid equivalents, dry basis and corrected to 7 percent oxygen (*expected to change to 32 parts per million in the final MACT standard, unless otherwise specified in the latest revision to the MACT).

(g) Particulate matter in excess of of 34 mg/dscm* corrected to 7 percent oxygen per the interim standard (*expected to change to 0.013 gr/dscf in the final MACT standard, unless otherwise specified in the latest revision to the MACT).

2.c 40 CFR §63.1203(c): The permittee shall comply with the following emission limits, or as established in the final rule after its compliance date, whichever are currently applicable:

i. The permittee must achieve a destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC) designated under paragraph (c)(3) of §63.1203. The permittee must calculate DRE for each POHC from the following equation:

$$DRE = [1 - (Wout / Win)] \times 100\%$$

where:

Win = mass feedrate of one POHC in a waste feedstream; and
Wout = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere.

2.d 40 CFR §63.1206(b): Compliance with standards.

The emission standards and operating requirements set forth in this subpart apply at all times except:

i. during periods of startup, shutdown, and malfunction; and

ii. when hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cut off for a period of time not less than the hazardous waste residence time) and the permittee has documented in the operating record that the permittee is complying with all otherwise applicable requirements and standards promulgated under authority of sections 112 or 129 of the Clean Air Act in lieu of the emission standards of §63.1203 through 63.1205; the monitoring and compliance standards of this section and §63.1207 through 63.1209, except the modes of operation requirements of §63.1209(q); and the notification, reporting, and record keeping requirements of §63.1210 through 63.1212.

2.e 40 CFR 63.1209(q): Operating under different modes of operation.

Operating under otherwise applicable standards after the hazardous waste residence time has transpired. As provided by §63.1206(b)(1)(ii), the permittee may operate under otherwise applicable requirements promulgated under sections 112 and 129 of the Clean Air Act in lieu of the substantive requirements of 40 CFR §63 Subpart EEE. Specifically, when operating in the "warm stand-by maintenance mode" as documented in the Operating and Maintenance Plan, only the following otherwise applicable requirements apply:

i. OAC rule 3745-17-07(A), OAC rule 3745-17-09, and OAC rule 3745-18-06(E) per A.I.1. above pertaining to PE and SO2 limits.

ii. The monitoring, record keeping, reporting, and testing requirements III.3, IV.3, and V.1 below pursuant to the OAC rules.

II. Operational Restrictions

1. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The pressure drop across the baghouse shall be maintained within the range of 1.5 to 8 inches of water as an hourly rolling average while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

2. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall operate and maintain the wet scrubber at all times the process vent stream is vented to the scrubber, and burning waste in accordance with the following parameters:

a. the pH of the scrubber liquid shall be maintained at or above 4.6 as an hourly rolling average;

b. the liquid-to-gas ratio shall be maintained at or above six gallons per 1,000 actual cubic feet as an hourly rolling average;

c. the pressure drop across the scrubber shall be maintained at a value of not less than 3.5 inches of water as an hourly rolling average; and

d. the blowdown rate for the scrubber shall be maintained above 2.01 gallons per minute as an hourly rolling average.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

3. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall maintain the combustion hearth at the following conditions while burning waste:

a. the hearth flue gas temperature shall be maintained at or above 1,323 degrees F as an hourly rolling average; and

b. the hearth pressure shall be maintained below 0.0 inches of water with a 5-second delay.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

4. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall maintain the secondary combustion chamber gas temperature at or above 1,629 degrees F as an hourly rolling average while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

5. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall minimize baghouse leaks as follows:

a. the permittee shall maintain an indicator to detect baghouse leaks, and not have a 100 percent indication for more than 30 minutes while burning waste; and

b. the temperature of the baghouse inlet gas shall not exceed 487 degrees F as an hourly rolling average while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

6. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall maintain waste feed rates as follows:

a. the pumpable waste feed rate shall be maintained below 4,214 pounds per hour as an hourly rolling average; and

b. the total waste feed rate shall be maintained below 4,250 pounds per hour as an hourly rolling average.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

7. 40 CFR §63, Subpart EEE: The permittee shall comply with the following operating limits, or as established in the most recent Document of Compliance or Notification of Compliance, whichever are currently applicable:

The permittee shall maintain combustion gas flow rates (stack gas flow rates) as follows while burning waste:

a. the maximum combustion gas flow rate shall be maintained below 13,620 acfm as an hourly rolling average; and

b. the minimum combustion gas flow rate shall be maintained above 7,738 acfm (as a 12 hour rolling average).

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

8. 40 CFR §63.1206(c)(2)(v): Operating under the startup, shutdown, and malfunction plan.

Compliance with AWFCO requirements during malfunctions:

a. During malfunctions, the automatic waste feed cutoff requirements of §63.1206(c)(3) continue to apply, except for paragraphs (c)(3)(v) and (c)(3)(vi) of §63.1206. If the permittee exceeds a 40 CFR §63, Subpart EEE, emission standard monitored by a CEMS or COMs or operating limit specified under §63.1209, the automatic waste feed cutoff system must immediately and automatically cutoff the hazardous waste feed, except as provided by paragraph (c)(3)(viii) of §63.1206. If the malfunction itself prevents immediate and automatic cutoff of the hazardous waste feed, however, the permittee must cease feeding hazardous waste as quickly as possible.

b. Although the automatic waste feed cutoff requirements continue to apply during a malfunction, an exceedance of an emission standard monitored by a CEMS or COMS or operating limit specified under §63.1209 is not a violation of this subpart if the permittee takes the corrective measures prescribed in the startup, shutdown, and malfunction plan.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

9. 40 CFR §63.1206(c)(3): Automatic waste feed cutoff (AWFCO).

a. General. Upon the compliance date, the permittee must operate the hazardous waste combustor with a functioning system that immediately and automatically cuts off the hazardous waste feed, except as provided by paragraph (c)(3)(viii) of §63.1206:

i. When any of the following are exceeded: Operating parameter limits specified under §63.1209; an emission standard monitored by a CEMS; and the allowable combustion chamber pressure.

ii. When the span value of any CMS detector, except a CEMS, is met or exceeded.

iii. Upon malfunction of a CMS monitoring an operating parameter limit specified under §63.1209 or an emission level.

iv. When any component of the automatic waste feed cutoff system fails.

b. Ducting of combustion gases. During an AWFCO, the permittee must continue to duct combustion gasses to the air pollution control system while hazardous waste remains in the combustion chamber (i.e., if the hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated).

c. Restarting waste feed. The permittee must continue to monitor, during the cutoff, the operating parameters for which limits are established under §63.1209 and the emissions required under that section to be monitored by a CEMS, and the permittee must not restart the hazardous waste feed until the operating parameters and emission levels are within the specified limits.

d. Failure of the AWFCO system. If the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon exceedance of parameter required to be interlocked with the AWFCO system under paragraph (c)(3)(i) of §63.1206, the permittee has failed to comply with the AWFCO requirements of paragraph (c)(3) of §63.1206.

e. Corrective measures. If, after any AWFCO, there is an exceedance of an emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber (i.e., whether the hazardous waste residence time has transpired since the hazardous waste feed cutoff system was activated), the permittee must investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs, and record the findings and corrective measures in the operating record.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

10. 40 CFR §63.1206(c)(6): Operator training and certification.

a. The permittee must establish training programs for all categories of personnel whose activities may reasonably be expected to directly affect emissions of hazardous air pollutants from the source. Such persons include, but are not limited to, chief facility operators, control room operators, continuous monitoring system operators, persons that sample and analyze feedstreams, persons that manage and charge feedstreams to the combustor, persons that operate emission control devices, and ash and waste handlers. Each training program shall be of a technical level commensurate with the person's job duties specified in the training manual. Each commensurate training program shall require an examination to be administered by the instructor at the end of the training course. Passing of this test shall be deemed the "certification" for personnel, except that, for control room operators, the training and certification program shall be as specified in paragraphs (c)(6)(iii) through (c)(6)(vi) of §63.1206.

b. The permittee must ensure that the source is operated and maintained at all times by persons who are trained and certified to perform these and any other duties that may affect emissions of hazardous air pollutants. A certified control room operator must be on duty at the site at all times the source is in operation.

c. Hazardous waste incinerator control room operators must:

i. Be trained and certified under a site-specific, source-developed and implemented program that meets the requirements of paragraph (c)(6)(v) of §63.1206; or

ii. Be trained under the requirements of, and certified under, the American Society of Mechanical Engineers Standard Number QHO-1-1994 and QHO-1a-1996 Addenda [incorporated by reference--see §63.14(e)]. If the permittee chooses to use the ASME program:

(a) Control room operators must, prior to the compliance date, achieve provisional certification, and must submit an application to ASME and be scheduled for the full certification exam. Within one year of the compliance date, control room operators must achieve full certification;

(b) New operators and operators of new sources must, before assuming their duties, achieve provisional certification, and must submit an application to ASME, and be scheduled for the full certification exam. Within one year of assuming their duties, these operators must achieve full certification; or

(iii) Be trained and certified under a State program.

d. Site-specific, source developed and implemented training programs for control room operators must include the following elements:

i. Training on the following subjects:

(a) Environmental concerns, including types of emissions.
(b) Basic combustion principles, including products of combustion.
(c) Operation of the specific type of combustor used by the operator, including proper startup, waste firing, and shutdown procedures.
(d) Combustion controls and continuous monitoring systems.
(e) Operation of air pollution control equipment and factors affecting performance.
(f) Inspection and maintenance of the combustor, continuous monitoring systems, and air pollution control devices.
(g) Actions to correct malfunctions or conditions that may lead to malfunction.
(h) Residue characteristics and handling procedures.
(i) Applicable Federal, state, and local regulations, including Occupational Safety and Health Administration workplace standards.

II. Operational Restrictions (continued)

ii. An examination designed and administered by the instructor; and

iii. Written material covering the training course topics that may serve as reference material following completion of the course.

e. To maintain control room operator qualification under a site-specific, source developed and implemented training program as provided by paragraph (c)(6)(v) of §63.1206, control room operators must complete an annual review or refresher course covering, at a minimum, the following topics:

i. update of regulations;
ii. combustor operation, including startup and shutdown procedures, waste firing, and residue handling;
iii. inspection and maintenance;
iv. responses to malfunctions or conditions that may lead to malfunction; and
v. operating problems encountered by the operator.

f. The permittee must record the operator training and certification program in the operating record.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

11. 40 CFR §63.1206(c)(7): Operation and maintenance plan.

General.

a. The permittee must prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants.

b. The plan must prescribe how you will operate and maintain the combustor in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels achieved during the comprehensive performance test.

c. This plan ensures compliance with the operation and maintenance requirements of §63.6(e) and minimizes emissions of pollutants, automatic waste feed cutoffs, and malfunctions.

d. The permittee must record the plan in the operating record.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. 40 CFR §63, Subpart EEE: Monitoring and Compliance Provisions.

The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The permittee shall record the following parameters for the baghouse while burning waste:

a. the leak indicator reading [per §63.1206(c)(7)(ii)];

b. baghouse inlet gas temperature (as an hourly rolling average) [per §63.1209(k)(1) & 1209(n)(1)]; and

c. the pressure drop across the baghouse (as an hourly rolling average) [per §63.1209(g)(2)].

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. 40 CFR §63, Subpart EEE: Monitoring and Compliance Provisions.

The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber liquor flow rate of the wet scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the folowing information while burning waste:

a. the pH of the scrubber liquor, (as an hourly rolling average) [per §63.1209(o)(3)(iv)];

b. the liquid-to-gas ratio, in gallons per 1000 cubic feet, (as an hourly rolling average) [per §63.1209(o)(3)(v)];

c. the pressure drop across the scrubber, (as an hourly rolling average) [per §63.1209(o)(3)(ii)];

d. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

e. the scrubber blowdown rate gpm (as an hourly rolling average) [per §63.1209(m)(1)(i)(B)(1)(ii)].

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

3. To comply with OAC rule 3745-18-06(E) the permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures in accordance with the relevant provisions of 40 CFR Part 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: 40 CFR Part 60.13 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. 40 CFR 63.1209(a)(2) & (j)(4): Performance specifications.

The permittee shall install, calibrate, maintain, and continuously operate the CEMS and COMS in compliance with the quality assurance procedures provided in the appendix to Subpart EEE and Performance Specifications 4B (carbon monoxide and oxygen) in appendix B, part 60 of this chapter. Specifically, the permittee shall operate and maintain existing equipment to continuously monitor and record CO from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in §63.1209(a)(2), (a)(3), (a)(6) and the Appendix to Subpart EEE.

A statement of certification of the existing continuous CO monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4B. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, parts per million CO on an instantaneous (one-minute) basis, emissions of CO in units of ppm in the appropriate averaging period , results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: 40 CFR, Part 63, Subpart EEE]

The permittee shall implement a quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of the Appendix to Subpart EEE and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification 4B, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

5. 40 CFR §63, Subpart EEE:

The permittee shall continuously record the stack flow rate in acfm (as an hourly average) while burning waste. [per §63.1209(j)(2) & (k)(3) & (m)(2) & (n)(5) & (o)(2) & 1207(m)(4)(i)]

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

6. 40 CFR §63, Subpart EEE:

The permittee shall continuously record the following hourly average lb/hour waste feed rates:

a. total waste feed rate to the hearth [per §63.1209(j)(3) & (k)(4)];

b. the waste feed rate to secondary combustion chamber [per §63.1209(j)(3) & (k)(4)]; and

c. the pumpable waste feed rate to the hearth [per §63.1209(j)(3) & (k)(4)].

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

7. 40 CFR §63, Subpart EEE:

The permittee shall record the rolling, 12-hour average lb/hr flow rates of the following:

a. the feed rate of chromium, arsenic and beryllium combined [per §63.1209(n)(2)];

b. the feed rate of lead and cadmium combined [per §63.1209(n)(2)];

c. the mercury feed rate [per §63.1209(l)(1) & 1207(m)(4)(i)];

d. the ash flow rate [per §63.1209(m)(3)]; and

e. the chlorine feed rate [per §63.1209(n)(4) & (o)(1)].

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

8. 40 CFR §63, Subpart EEE:

The permittee shall continuously record the following combustion temperatures while burning waste:

a. the hearth flue temperature (as an hourly average) [per §63.1209(j)(1) & (k)(2)]; and

b. the secondary combustion chamber temperature (as an hourly average) [per §63.1209(j)(1) & (k)(2)].

[Authority for term: 40 CFR, Part 63, Subpart EEE]

9. 40 CFR §63.1209(p):

The permittee shall continuously record the hearth pressure while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the following parameters for the baghouse did not comply with the allowable range specified above while burning waste:

a. the leak indicator reading;

b. baghouse inlet gas temperature; and

c. the pressure drop across the baghouse.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels for the wet scrubber while burning waste:

a. the pH of the scrubber liquor;

b. the liquid-to-gas ratio;

c. the pressure drop across the scrubber; and

d. the scrubber blowdown rate.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

3. Pursuant to OAC rules 3745-15-04, 3745-35-02, ORC sections 3704.03(I) and 3704.031, and §60.7 and §60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Northeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO2 values in excess of the applicable limits specified in OAC Chapter 3745-18, the 30-day rolling, weighted average SO2 emission rates, and average daily SO2 emission rates in units of the applicable standard(s). These reports shall also contain the total SO2 emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Northeast District Office documenting any continuous SO2 monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

4. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the ppm CO emission rate was not maintained at or below the required levels while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

5. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the combustion gas flow rate (stack gas flow rate) was not maintained as follows while burning waste:

a. at or below the required maximum flow rate in acfm (as an hourly average); and

b. at or above the required minimum flow rate in acfm (as a 12 hour average).

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

6. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the following hourly average lb/hour waste feed rates were not maintained at or below the required levels while burning waste:

a. total waste feed rate to the hearth;

b. the waste feed rate to secondary combustion chamber; and

c. the pumpable waste feed rate to the hearth.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

7. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the 12 hour rolling average lb/hr flow rates of the following were not maintained at or below the required levels while burning waste:

a. the feed rate of chromium, arsenic and beryllium combined;

b. the feed rate of lead and cadmium combined;

c. the mercury feed rate;

d. the ash flow rate; and

e. the lb/hr chlorine feed rate.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

8. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the following combustion temperatures were not maintained at or above the required levels while burning waste:

a. the hearth flue temperature (as an hourly average); and

b. the secondary combustion chamber temperature (as an hourly average).

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

9. 40 CFR §63.10(e)(3):

The permittee shall submit deviation (excursion) reports (excess emissions and continuous monitoring system performance reports) that identify all periods of time during which the hearth pressure was not maintained at or below the required levels while burning waste.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

10. 40 CFR §63.1211:

Record Keeping and Reporting Requirements

Summary of reporting requirements. The permittee must submit the following reports to the Administrator:

Reference Report
63.10(d)(5)(i).....Periodic startup, shutdown, and malfunction reports.
63.10(d)(5)(ii).....Immediate startup, shutdown and malfunction reports.
63.10(e)(3).....Excessive emissions and continuous monitoring system performance report and summary report.
63.1206(c)(3)(vi).....Excessive exceedances reports.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

11. 40 CFR 63.10(d)(5)(i):

Periodic startup, shutdown, and malfunction reports.

If actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan [see §63.6(e)(3)], the permittee shall state such information in a startup, shutdown, and malfunction report. Such a report shall identify any instance where any action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the affected source's startup, shutdown, and malfunction plan, but the source does not exceed any applicable emission limitation in the relevant emission standard. Such a report shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the permittee or other responsible official who is certifying its accuracy, that shall be submitted to the Administrator (the Ohio EPA Northeast District Office) semiannually (or on a more frequent basis if specified otherwise in a relevant standard or as established otherwise by the permitting authority in the source's Title V permit). The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate).

If the permittee is required to submit excess emissions and continuous monitoring system performance (or other periodic) reports under this part, the startup, shutdown, and malfunction reports required under this paragraph may be submitted simultaneously with the excess emissions and continuous monitoring system performance (or other) reports.

Alternatively, the permittee may submit the periodic startup, shutdown, and malfunction reports quarterly along with the deviation (excursion) reports.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

12. 40 CFR 63.10(d)(5)(ii):

Immediate startup, shutdown, and malfunction reports.

Notwithstanding the allowance to reduce the frequency of reporting for periodic startup, shutdown, and malfunction reports under paragraph (d)(5)(i) of §63.10, any time an action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, and the source exceeds any applicable emission limitation in the relevant emission standard, the permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event. The immediate report required under §63.10(d)(5)(ii) shall consist of a telephone call (or facsimile (FAX) transmission) to the Administrator (the Ohio EPA Northeast District Office) within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the permittee or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred. Notwithstanding the requirements of the previous sentence, after the effective date of an approved permit program in the State in which an affected source is located, the permittee may make alternative reporting arrangements, in advance, with the permitting authority in that State. Procedures governing the arrangement of alternative reporting requirements under §63.10(d)(5)(ii) are specified in §63.9(i).

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

13. 40 CFR 63.10(e)(3):

Excess emissions and continuous monitoring system performance report and summary report.

Excess emissions and parameter monitoring exceedances are defined in relevant standards. The permittee of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator (the appropriate Ohio EPA District Office or local air agency) semiannually.

40 CFR 63.10(e)(3)(v):

Content and submittal dates for excess emissions and monitoring system performance reports.

All excess emissions and monitoring system performance reports and all summary reports, if required, shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. Written reports of excess emissions or exceedances of process or control system parameters shall include all the information required in paragraphs (c)(5) through (c)(13) of §63.10, in §63.8(c)(7) and §63.8(c)(8), and in the relevant standard, and they shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

40 CFR 63.10(e)(3)(vi): Summary report.

As required under paragraphs (e)(3)(vii) and (e)(3)(viii) of §63.10, one summary report shall be submitted for the hazardous air pollutants monitored at each affected source (unless the relevant standard specifies that more than one summary report is required, e.g., one summary report for each hazardous air pollutant monitored). The summary report shall be entitled "Summary Report--Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and shall contain the following information:

IV. Reporting Requirements (continued)

a. the company name and address of the affected source;
b. an identification of each hazardous air pollutant monitored at the affected source;
c. the beginning and ending dates of the reporting period;
d. a brief description of the process units;
e. the emission and operating parameter limitations specified in the relevant standard(s);
f. the monitoring equipment manufacturer(s) and model number(s);
g. the date of the latest CMS certification or audit;
h. the total operating time of the affected source during the reporting period;
i. an emission data summary (or similar summary if the permittee monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;
j. a CMS performance summary (or similar summary if the permittee monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;
k. a description of any changes in CMS, processes, or controls since the last reporting period;

l. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and
m. the date of the report.

40 CFR 63.10(e)(3)(vii):

If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator.

40 CFR 63.10(e)(3)(viii):

If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

Alternatively, the permitte may submit the excess emissions and continuous monitoring system performance report and summary report quarterly along with the Title V deviation (excursion) reports.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

14. 40 CFR §63.1206(c)(3)(vi):

Excessive exceedance reporting.

a. For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, you must submit to the Administrator (the Ohio EPA Northeast District Office) a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken.

b. On a case-by-case basis, the Administrator may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period.

40 CFR §63.1206(c)(2)(v)(A)(3)

Excessive exceedances during malfunctions.

For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, you must:

i. within 45 days of the 10th exceedance, complete an investigation of the cause of each exceedance and evaluation of approaches to minimize the frequency, duration, and severity of each exceedance, and revise the startup, shutdown, and malfunction plan as warranted by the evaluation to minimize the frequency, duration, and severity of each exceedance; and

ii. record the results of the investigation and evaluation in the operating record, and include a summary of the investigation and evaluation, and any changes to the startup, shutdown, and malfunction plan, in the excess emissions report required under §63.10(e)(3).

[Authority for term: 40 CFR, Part 63, Subpart EEE]

V. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1)

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-04(A), and OAC rule 3745-17-03(B)(1)]

1.b Emission Limitation:
Particulate emissions shall not exceed 0.10 pound per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-04(A), and OAC rule 3745-17-03(B)(9)]

V. Testing Requirements (continued)

1.c Emission Limitation:
39.4 lbs of SO2 per hour.

Applicable Compliance Method:
Compliance shall be demonstrated by records of data obtained by the continuous SO2 monitoring system, and, if required, using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while the emissions unit is operating at worst case emission conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-04(A), and OAC rule 3745-18-04(A)]

2. 40 CFR §63.1206(c)(3)(vii): Testing.

The AWFCO system and associated alarms must be tested at least monthly to verify operability. The permittee must document and record in the operating record AWFCO operability test procedures and results.

[Authority for term: 40 CFR, Part 63, Subpart EEE and OAC rule 3745-77-07(C)(1)]

3. 40 CFR 63.1207(d)(4): Performance Testing.

Applicable testing requirements under the current interim standards (effective until the final rule is promulgated).

a. Waiver of periodic comprehensive performance tests. Except as provided by paragraph (c)(2) of §63.1207, the permittee must conduct only an initial comprehensive performance test under the interim standards (i.e., the standards published in the Federal Register on February 13, 2002); all subsequent comprehensive performance testing requirements are waived under the interim standards. The provisions in the introductory text to paragraph (d) and in paragraph (d)(1) of §63.1207 do not apply until USEPA promulgates permanent replacement standards pursuant to the Settlement Agreement noticed in the Federal Register on November 16, 2001.

b. Waiver of confirmatory performance tests. The permittee is not required to conduct a confirmatory test under the interim standards (i.e., the standards published in the Federal Register on February 13, 2002). The confirmatory testing requirements in the introductory text to paragraph (d) and in paragraph (d)(2) of §63.1207 are waived until US EPA promulgates permanent replacement standards pursuant to the Settlement Agreement noticed in the Federal Register on November 16, 2001.

Frequency of testing.

Except as otherwise specified in §63.1207(d)(4), the permittee must conduct testing periodically as prescribed in paragraphs (d)(1) through (d)(3) of §63.1207. The date of commencement of the initial comprehensive performance test is the basis for establishing the deadline to commence the initial confirmatory performance test and the next comprehensive performance test. The permittee may conduct performance testing at any time prior to the required date. The deadline for commencing subsequent confirmatory and comprehensive performance testing is based on the date of commencement of the previous comprehensive performance test. Unless the Administrator grants a time extension under §63.1207(i), the permittee must conduct testing as follows:

V. Testing Requirements (continued)

b. 40 CFR 63.1207: Frequency of testing under the proposed final rule (to become applicable when promulgated):

Comprehensive performance testing.

Except as otherwise specified in §63.1207(d)(4), the permittee must commence testing no later than 61 months after the date of commencing the previous comprehensive performance test. If the permittee submits data in lieu of the initial performance test, you must commence the subsequent comprehensive performance test within 61 months of commencing the test used to provide the data in lieu of the initial performance test.

Confirmatory performance testing.

Except as otherwise specified in §63.1207(d)(4), the permittee must commence confirmatory performance testing no later than 31 months after the date of commencing the previous comprehensive performance test. If the permittee submits data in lieu of the initial performance test, the permittee must commence the initial confirmatory performance test within 31 months of the date six months after the compliance date. To ensure that the confirmatory test is conducted approximately midway between comprehensive performance tests, the Administrator will not approve a test plan that schedules testing within 18 months of commencing the previous comprehensive performance test.

Duration of testing.

The permittee must complete performance testing within 60 days after the date of commencement, unless the Administrator determines that a time extension is warranted based on the permittee's documentation in writing of factors beyond the permittee's control that prevent the permittee from meeting the 60-day deadline.

40 CFR 63.1207(h): Operating conditions during subsequent testing.

Current operating parameter limits established under §63.1209 are waived during subsequent comprehensive performance testing.

Current operating parameter limits are also waived during pretesting prior to comprehensive performance testing for an aggregate time not to exceed 720 hours of operation (renewable at the discretion of the Administrator) under an approved test plan or if the source records the results of the pretesting.

[Authority for term: 40 CFR, Part 63, Subpart EEE, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process C (P001)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process C (P001): production of lubricant additives through neutralization of thiophosphoryl compounds using three reactor systems. A reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the three reactor systems are controlled by either a wet scrubber using water as the scrubbing solution (C-1 WScrb), or one of two flares (A-28 or C-5 Flare). SO2 emissions will result from the combustion of sulfur-containing organic compounds at the flares.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.
	OAC rule 3745-18-06(E)	SO2: 19.05 lbs/hr

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the flare(s) or the wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the flare(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall develop emission factors for the amount of SO2 emitted from the flare, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for all products containing sulfur. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch in kg;

c. the processing time for each batch in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

Where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

7. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for this scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flares. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flares, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the pound per hour emission limitation for SO2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flares, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flares. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the flare(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 19.05 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by testing the amount of sulfur produced by this emissions unit prior to the flare using a U.S. EPA approved test method subject to the review and approval of the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process F (P005)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process F (P005): production of lubricant additives through alkylation using one reactor system. A reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the reactor system are controlled by one of two flares (A-28 or F-4 Flare).	OAC rule 3745-21-09 (LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare(s), in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run);

f. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare(s), in tons; and

g. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the flare(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flares. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flares, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.f. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flares, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flares. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the flare(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process G (P006)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process G (P006): production of lubricant additives through the use of corrosive inorganic and organic reactions using three reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the three reactor systems are controlled by a wet scrubber using a scrubbing solution of variable pH (G-3 Scrb), a caustic wet scrubber (G-4 CScrb), or an incinerator (AC-6/7 Fm Inc) followed by an emergency flare (S-4 Flare) as backup. SO2 emissions are controlled by the caustic wet scrubber.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.
	OAC rule 3745-18-06(E)	SO2: 26.99 lbs/hour, See A.I.2.e. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.e SO2 emissions generated from all of the reactor tanks when processing sulfur containing materials shall be controlled by the caustic wet scrubber.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or wet scrubbers, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either wet scrubber G-3 or G-4, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of either wet scrubber G-3 or G-4, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall develop emission factors for the amount of SO2 emitted from the process, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for all products containing sulfur. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch in kg;

c. the processing time for each batch in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

Where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The permittee shall properly operate and maintain equipment to monitor the pH of the G-3 (G-3 Scrb) scrubber liquor and to continuously monitor the scrubber liquor flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the pH of the caustic scrubber liquor, before and after each batch and once during the batch (if the scrubber liquor is changed after a batch, the pH shall be collected and recorded at the end of the batch run);

b. the scrubber liquor flow rate, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the pH or flow rate fall below the levels specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the pH or flow rate above the minimum levels specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pH and/or flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the pH of the scrubber liquor is not less than 7.0.

The acceptable level for the scrubber liquor flow rate for this scrubber is not less than 2 gallons per minute.

These levels are effective for the duration of this permit. If the acceptable levels are not rule based, the permittee may request revisions. Any changes in the acceptable levels must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the levels based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the levels will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

8. The permittee shall properly operate and maintain equipment to monitor the free NaOH concentration of the scrubber liquor and properly operate and maintain equipment to continuously monitor the scrubber liquor flow rate of wet scrubber G-4 (G-4 CScrb) while the emissions unit is in operation, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the free NaOH concentration (percent) of the scrubber liquor (the permittee shall record the percent free NaOH concentration before and after each batch reaction);

b. the scrubber liquor flow rates, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the NaOH concentration or flow rate fall below the levels specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the NaOH concentration or flow rate above the minimum levels specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the NaOH concentration and/or flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the NaOH concentration of the scrubber liquor shall be the minimum concentration established during the most recent emission test that demonstrated the emissions unit was in compliance with the allowable mass emission rate for SO2. If a deviation in the minimum free NaOH concentration occurs, the facility may choose to demonstrate compliance through stack testing and establish a lower minimum free NaOH concentration..

The acceptable level for the scrubber liquor flow rate for this scrubber is not less than 2 gallons per minute.

These levels are effective for the duration of this permit. If the acceptable levels are not rule based, the permittee may request revisions. Any changes in the acceptable levels must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the levels based upon information obtained during future SO2 emission tests that demonstrate compliance with the allowable SO2 emission rate for this emissions unit. In addition, approved revisions to the levels will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

9. The permittee shall record daily any time period that emissions of SO2 were not vented to the caustic wet scrubber.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the pound per hour emission limitation for SO2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of wet scrubber G-3 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber liquor pH or the scrubber liquor flow rate was below the respective acceptable levels;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber liquor pH and scrubber liquor flowrate into compliance with the acceptable levels, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

7. Unless the control efficiency of wet scrubber G-4 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the free NaOH concentration (percent) of the scrubber liquor or the scrubber liquor flow rate was below the respective acceptable levels;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the free NaOH concentration (percent) of the scrubber liquor and scrubber liquor flow rate into compliance with the acceptable levels, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall submit deviation (excursion) reports that identify all periods of time during which emissions of SO2 were not vented to the caustic wet scrubber.

[Authority for term: OAC rule 3745-77-07(C)(1)]

9. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 26.99 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by emissions testing of wet scrubber G-4 using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. emission testing of wet scrubbers G-3 and G-4 shall be conducted to determine control efficiency (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubbers G-3 and G-4 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process H (P007)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process H (P007): production of lubricant additives through the use of corrosive inorganic and organic reactions using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by either a caustic wet scrubber (H-1 CScrb) or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or wet scrubbers, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either wet scrubber H-1 alone, or in conjunction with wet scrubber H-2, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of either wet scrubber H-1 alone or in conjunction with wet scrubber H-2 (when associated with that particular vent stream) as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to monitor the pH of the H-1 (H-1 CScrb) scrubber liquor and to continuously monitor the scrubber liquor flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the pH of the caustic scrubber liquor, before and after each batch and once during the batch (if the scrubber liquor is changed after a batch, the pH shall be collected and recorded at the end of the batch run);

b. the caustic scrubber liquor flow rate, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the pH or flow rate fall below the levels specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the pH or flow rate above the minimum levels specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pH and/or flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the pH of the scrubber liquor is not less than 7.0.

The acceptable level for the scrubber liquor flow rate for this scrubber is not less than 2 gallons per minute.

These levels are effective for the duration of this permit. If the acceptable levels are not rule based, the permittee may request revisions. Any changes in the acceptable levels must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the levels based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the levels will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of wet scrubber H-1 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber liquor pH or the scrubber liquor flow rate was below the respective acceptable levels;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber liquor pH and scrubber liquor flowrate into compliance with the acceptable levels, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of wet scrubber H-1 (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubber H-1 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process I (P008)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process I (P008): production of lubricant additives through the use of corrosive inorganic and organic reactions using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by a wet scrubber using water as the scrubbing solution (C-1 WScrb) or a flare (F-4 Flare).	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the flare or wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for this scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process L (P011)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process L (P011): production of lubricant additives through thiophosphorylation using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by carbon adsorber (O-1 CDrum) or a an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.
	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	SO2: 2.4 lbs/hr, See A.I.2.e. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals which minimize the amount of VOC exposed to the ambient air.

2.e The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

7. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

9. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 2.4 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process M (P012)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process M (P012): production of lubricant additives through condensation using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by either a wet scrubber using water as the scrubbing solution (P-2 WScrb), a carbon adsorber (P-3 CDrum), or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.	OAC rule 3745-21-09 (LL) Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	See A.I.2.a. through A.I.2.e. below. SO2: 160.0 lbs/hr, See A.I.2.f. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), or a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.f The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s), flare, wet scrubber or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either the wet scrubber or carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber or carbon adsorber, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for scrubber P-2 (P-2 WScrb), in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for scrubber P-2 is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

7. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

9. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

10. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

11. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

12. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

13. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. Unless the control efficiency of the wet scrubber P-2 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

9. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

10. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s) or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 160.0 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of wet scrubber P-2 and the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubber P-2 and the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process N (P013)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process N (P013): production of lubricant additives through organic sulfurization using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by either a carbon adsorber (P-3 CDrum), a wet scrubber using water as the scrubbing solution (P-2 Wscrb), or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.	OAC rule 3745-21-09 (LL) Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	See A.I.2.a. through A.I.2.e. below. SO2: 25.0 lbs/hr, See A.I.2.f. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), or a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.f The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s), flare, wet scrubber or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either the wet scrubber or carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber or carbon adsorber, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

7. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

9. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

10. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

11. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

12. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

9. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

10. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s) or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 25.0 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of wet scrubber P-2 and the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubber P-2 and the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process O (P014)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process O (P014): production of lubricant additives through thiophosphorylation using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by a carbon adsorber (O-1 CDrum) or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.
	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	SO2: 10.0 lbs/hr, See A.I.2.e. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.e The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

7. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

9. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 10.0 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process P (P015)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process P (P015): production of lubricant additives through neutralization with an organic base using five reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the five reactor systems are controlled by either a wet scrubber using water as the scrubbing solution (P-2 WScrb), a carbon adsorber (P-3 CDrum), or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09 (LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2. Additional Terms and Conditions (continued)

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s), wet scrubber or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either the wet scrubber or carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber or carbon adsorber, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

6. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of wet scrubber P-2 and the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubber P-2 and the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process S (P018)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process S (P018): production of lubricant additives through neutralization with an organic base in solvent using three reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the three reactor systems are controlled by either a wet scrubber using water as the scrubbing solution (P-2 WScrb), a carbon adsorber (P-3 CDrum), a caustic wet scrubber (N-2 CScrb) followed by a flare (S-4 Flare), or an incinerator (AC-6/7 Fm Inc's).	OAC rule 3745-21-09 (LL)	See A.I.2.a. through A.I.2.e. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), or a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2. Additional Terms and Conditions (continued)

2.d Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s), flare, wet scrubber or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either the wet scrubber or carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber or carbon adsorber, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

7. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

9. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s) or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber and carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber and carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process T (P019)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process T (P019): production of lubricant additives through esterification using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by one of two wet scrubbers that use water as the scrubbing solution (T-3 or T-4 WScrb).	OAC rule 3745-21-09(LL)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The total VOC emissions not controlled by an incinerator or flare shall not exceed five tons per rolling twelve-month period. The total VOC emissions not controlled by an incinerator or flare shall be based on the emissions from all process vent streams.

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the wet scrubber(s), in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by either wet scrubber T-3 or T-4, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of either wet scrubber T-3 or T-4, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate for all final products generated (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for wet scrubbers T-3 and T-4 (T-3/4 WScrb), in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber water flow rate for scrubbers T-3 and T-4 is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. Unless the control efficiency of wet scrubbers T-3 and T-4 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of wet scrubbers T-3 and T-4 (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubbers T-3 and T-4 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process U (P020)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process U (P020): production of lubricant additives through terpolymerization using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by either a carbon adsorber (U-7 CDrum), a flare (U-5 Flare), or an incinerator (AC-6/7 Fm Inc's).	OAC rule 3745-21-09 (LL) PTI 02-784	See A.I.2.a. through A.I.2.e. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), or a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2. Additional Terms and Conditions (continued)

2.d Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s), flare or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

6. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s) or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process W (P022)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process W (P022): production of lubricant additives through blending using 50 blending tanks. Volatile organic compound (VOC) emissions from the blend tanks are controlled by a carbon adsorber (W-1 CDrum) or an incinerator (AC-6/7 Fm Inc's).	OAC rule 3745-21-09(LL) PTI 02-872	See A.I.2.a. through A.I.2.d. below.
	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	SO2: 20.0 lbs/hr, See A.I.2.e. below.
SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.		

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2. Additional Terms and Conditions (continued)

2.e The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

7. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

9. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 20.0 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process Y (P024)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process Y (P024): the handling and storage of lime using a fabric filter baghouse (Y-1 Filter) to control particulate emissions.	OAC rule 3745-17-07(A)(1)	See A.I.2.a. below.
	OAC rule 3745-17-11(B)	PE: 3.53 lbs/hr

2. Additional Terms and Conditions

2.a Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

2.b All particulate emissions from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform checks for any visible particulate emissions that may result from the unloading of lime. The presence or absence of any visible emissions shall be noted in an operations log each time lime is unloaded into the storage silo. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. whether the emissions are representative of normal operations;
b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
c. the total duration of any visible emission incident; and
d. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly written reports that (a) identify all times during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-17-03(B)(1), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: Particulate emissions shall not exceed 3.53 lbs per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-17-03(B)(10), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process A (P025)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process A (P025): production of lubricant additives through neutralization with an inorganic base using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by a wet scrubber using oil as the scrubbing solution (A-21 OScrb) followed by a condenser (A-22 RCond).	OAC rule 3745-21-09(LL)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The total VOC emissions not controlled by an incinerator or flare shall not exceed five tons per rolling twelve-month period. The total VOC emissions not controlled by an incinerator or flare shall be based on the emissions from all process vent streams.

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the wet scrubber and condenser, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber and condenser, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber and condenser, as demonstrated during the most recent emissions test;

g. the total VOC emission rate for all final products generated (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber oil flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber oil flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the temperature of the exhaust gases of the condenser during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

Unless the control efficiency of the condenser is assumed to be zero, the permittee shall collect and record the following information each day:

a. the average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the temperature of the exhaust gases of the condenser exceeds the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the temperature of the exhaust gases of the condenser below the maximum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average temperature of the exhaust gases from the condenser, for any 3-hour block of time, is not more than 11 degrees Fahrenheit above the average temperature, as specified by the manufacturer.

If the control efficiency of the condenser is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the condenser, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Unless the control efficiency of oil scrubber A-21 OScrb is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber oil flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the temperature of the exhaust gases of the condenser was below the required level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the temperature level of the exhaust gases of the condenser into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the oil wet scrubber and condenser (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the oil wet scrubber and condenser shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process B (P026)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process B (P026): production of lubricant additives through neutralization of aromatic acids using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by a wet scrubber using oil as the scrubbing solution (B-10 OScrb) followed by a caustic wet scrubber (B-11 CScrb) and an ozone generator (B-12 O3 Gen).	OAC rule 3745-21-09(LL)	See A.I.2.a. and A.I.2.b. below.
	OAC rule 3745-18-06(E)	SO2: 29.62 lbs/hour

2. Additional Terms and Conditions

2.a The total VOC emissions not controlled by an incinerator or flare shall not exceed five tons per rolling twelve-month period. The total VOC emissions not controlled by an incinerator or flare shall be based on the emissions from all process vent streams.

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the wet scrubbers, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by wet scrubbers B-10 and B-11, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of wet scrubber B-10 and B-11, as demonstrated during the most recent emissions test;

g. the total VOC emission rate for all final products generated (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall develop emission factors for the amount of SO2 emitted from the ozone generator, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for the amount of SO2 emitted from the ozone generator. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch in kg;

c. the processing time for each batch in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

Where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber oil flow rate for oil scrubber B-10 (B-10 OScrb), in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber oil flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber oil flow rate for oil scrubber B-10 is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall properly operate and maintain equipment to monitor the free Na2S and NaOH concentrations of the scrubber liquor and properly operate and maintain equipment to continuously monitor the scrubber liquor flow rate of caustic scrubber B-11 (B-11 CScrb) while the emissions unit is in operation, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the free Na2S and NaOH concentrations (percent) of the scrubber liquor (the permittee shall record the percent free Na2S and NaOH concentrations before and after each batch reaction);

b. the scrubber liquor flow rates, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the Na2S or NaOH concentrations or flow rate fall below the levels specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the Na2S or NaOH concentrations or flow rate above the minimum levels specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the NaOH concentration and/or flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the Na2S and NaOH concentrations of the scrubber liquor shall be not less than zero (0) percent (%).

The acceptable level for the scrubber liquor flow rate for this scrubber is not less than 2 gallons per minute.

These levels are effective for the duration of this permit. If the acceptable levels are not rule based, the permittee may request revisions. Any changes in the acceptable levels must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the levels based upon information obtained during future SO2 emission tests that demonstrate compliance with the allowable SO2 emission rate for this emissions unit. In addition, approved revisions to the levels will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the pound per hour emission limitation for SO2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. Unless the control efficiency of oil scrubber B-10 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber oil flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of caustic scrubber B-11 is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the free Na2S or NaOH concentrations (percent) of the scrubber liquor or the scrubber liquor flow rate was below the respective acceptable levels;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the free Na2S or NaOH concentrations (percent) of the scrubber liquor and scrubber liquor flow rate into compliance with the acceptable levels, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 29.62 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by emissions testing of the ozone generator using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of oil scrubber B-10 and caustic scrubber B-11 (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of oil scrubber B-10 and caustic scrubber B-11 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AB (P027)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AB (P027): production of lubricant additives through neutralization with an inorganic base using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by a wet scrubber using water as the scrubbing solution (AB-11 WScrb) or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2. Additional Terms and Conditions (continued)

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AA (P028)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AA (P028): production of lubricant additives through alkylation using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by a carbon adsorber (AA-9) or an incinerator (AC-6 or AC-7) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or carbon adsorber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the carbon adsorber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the carbon adsorber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process Z (P029)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process Z (P029): production of lubricant additives through thiophosphorylation using three reactor systems. A reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the three reactor systems are controlled by either a caustic wet scrubber (Z-1 CScrb) or a flare (Z-10 Flare). SO2 emissions will result from the combustion of sulfur-containing organic compounds at the flare.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.
	OAC rule 3745-18-06(E)	SO2: 68.8 lbs/hr

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the flare or the wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall develop emission factors for the amount of SO2 emitted from the flare, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for all products containing sulfur. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch in kg;

c. the processing time for each batch in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

Where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

7. The permittee shall properly operate and maintain equipment to monitor the free Na2S and NaOH concentrations of the scrubber liquor and properly operate and maintain equipment to continuously monitor the scrubber liquor flow rate of the caustic scrubber while the emissions unit is in operation, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the free Na2S and NaOH concentrations (percent) of the scrubber liquor (the permittee shall record the percent free Na2S and NaOH concentrations before and after each batch reaction);

b. the scrubber liquor flow rates, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the Na2S or NaOH concentrations or flow rate fall below the levels specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the Na2S or NaOH concentrations or flow rate above the minimum levels specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the NaOH concentration and/or flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the Na2S and NaOH concentrations of the scrubber liquor shall be not less than zero (0) percent (%).

The acceptable level for the scrubber liquor flow rate for this scrubber is not less than 2 gallons per minute.

These levels are effective for the duration of this permit. If the acceptable levels are not rule based, the permittee may request revisions. Any changes in the acceptable levels must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the levels based upon information obtained during future SO2 emission tests that demonstrate compliance with the allowable SO2 emission rate for this emissions unit. In addition, approved revisions to the levels will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the pound per hour emission limitation for SO2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the caustic scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the free Na2S or NaOH concentrations (percent) of the scrubber liquor or the scrubber liquor flow rate was below the respective acceptable levels;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the free Na2S or NaOH concentrations (percent) of the scrubber liquor and scrubber liquor flow rate into compliance with the acceptable levels, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 68.8 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by testing the amount of sulfur produced by this emissions unit prior to the flare using a U.S. EPA approved test method subject to the review and approval of the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the caustic wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the caustic wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AC (P030)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AC (P030): production of lubricant additives through a sulfurized olefin process using one reactor system. A reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the reactor system are controlled by an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (AC-2 Flare) as backup. SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system.	OAC rule 3745-21-09 (LL) PTI 02-388	See A.I.2.a. through A.I.2.e. below.
	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000	SO2: 30.0 lbs/hr, See A.I.2.f. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), or a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals which minimize the amount of VOC exposed to the ambient air.

2.f The total hourly and annual SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs per hour and 100 tons per year.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run);

f. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare(s), in tons; and

g. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall maintain hourly records of the following information:

a. the actual SO2 emission rate from the fume incinerator system, in pounds per hour;

b. the rolling, three-hour average, actual SO2 emission rate from the fume incinerator system, in pounds per hour;

c. the total allowable SO2 emission rate, in pounds per hour, for all the emissions units (P011, P012, P013, P014, P022 and P030) in operation during the hour; and

d. the rolling, three-hour average, allowable SO2 emission rate, in pounds per hour.

The permittee shall maintain records that document which emissions units (P011, P012, P013, P014, P022 and P030) were in operation during each hour. If an emissions unit is in operation during any portion of an hour, it is considered to be in operation for the entire hour for purposes of determining compliance with the total allowable SO2 emission rate for all the emissions units in operation during any hour. Compliance shall be determined by comparing the rolling, three-hour average, actual and allowable, SO2 emission rates for each hour.

The total allowable SO2 emissions for the fume incinerator system for any hour shall be the sum of the individual allowable SO2 emissions limitations for those emissions units that are in operation during any part of that hour. The total allowable SO2 emission rate for the fume incinerator system for any rolling, three-hour period shall be the average of the three, one-hour allowables comprising the three-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall maintain daily records of the actual SO2 emission rate from the fume incinerator system, in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. The permittee shall operate and maintain existing equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13(d)(1), (e)(2) and (h), respectively. The permittee may request alternative monitoring procedures or requirements and alternative relative accuracy test procedures, in accordance with the relevant provisions of 40 CFR Parts 60.13(i) and (j), by submitting a written request to the Director. Any alternative monitoring and/or testing acceptable to the Director shall be approved by the U.S. EPA as a revision to the State Implementation Plan (SIP) prior to the implementation of the alternative monitoring and/or testing.

A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of lbs/hr and lbs/hr rolling, three-hour average, and in the appropriate averaging period (e.g., hourly and hourly rolling of consecutive three-hour periods), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

9. The permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2 emission concentrations and exhaust gas flow rates. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and include provisions for conducting a relative accuracy test following each monitor probe replacement. The relative accuracy test shall be performed, and the monitoring system operated, in accordance with the procedures specified in Performance Specification Tests 2 and 3, 40 CFR Part 60, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours. Each record of any monitoring data, testing data, and support information required shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

III. Monitoring and/or Record Keeping Requirements (continued)

10. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.f. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports, for the preceding calendar quarter, that specifies the total SO2 emissions from emissions units P011, P012, P013, P014, P022 and P030 (as determined by record keeping required under A.III. of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit quarterly deviation reports that identify all rolling, three-hour periods during which the average SO2 emission rate exceeded the corresponding total allowable SO2 emission rate for the fume incinerator system.

The permittee shall submit quarterly reports documenting any downtime of the SO2 continuous emission rate monitoring system and/or control equipment while any of the emissions units were on line. The permittee shall provide the date, time, duration, reason (if known), an estimate of excess emissions, and any any corrective action(s) taken for each such incident. Normal downtimes for daily calibration and zero checks or periods where monitoring is maintained by a backup analyzer when the primary analyzer malfunctions shall not be reportable.

IV. Reporting Requirements (continued)

If no deviations occurred during a calendar year, the permittee shall submit a quarterly report that states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter. These reports shall also contain the total SO2 emissions for the calender quarter (in tons).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-35-02, OAC rule 3745-77-07(C)(1), 40 CFR Part 60.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

7. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s) or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 30.0 lbs of SO2 per hour

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping of the total hourly emission rate, as required in Section A.III. of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

V. Testing Requirements (continued)

1.c Emission Limitation: The total hourly emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 247.4 lbs of SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by the records of data obtained by the continuous SO2 monitoring system, as required in Section A.III of these terms and conditions, and, if required, by emissions testing of the fume incinerator system using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A.

Emissions testing and the relative accuracy test on the continuous SO2 monitor may be conducted at the same time while operating emissions units P011, P012, P013, P014, P022 and P030 at worst case emission conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-18-04(A), OAC rule 3745-77-07(C)(1), 40 CFR, Part 63.13, and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.d Emission Limitation: The total annual emissions from emissions units P011, P012, P013, P014, P022 and P030, combined, shall not exceed 100 tons of SO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions and by records of data obtained by the continuous SO2 monitoring system.

[Authority for term: OAC rule 3745-77-07(C)(1), and Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000]

1.e Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AF (P033)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AF (P033): production of lubricant additives through alkylation using five reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the five reactor systems are controlled by a wet scrubber using water as the scrubbing solution (C-1 WScrb) or a flare (C-5 Flare).	OAC rule 3745-21-09(LL) PTI 02-790	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by a flare that meets the requirements of paragraph OAC rule 3745-21-09(DD)(10)(d), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by a flare shall be based on the emissions from all process vent streams.

2. Additional Terms and Conditions (continued)

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the flare or the wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the flare (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

The permittee shall properly operate, and maintain equipment to continuously monitor and record the presence of a pilot flame during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

The permittee shall record the following information each day:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Whenever the monitoring indicates that there is no pilot flame while the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating scenario, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the results of monitoring immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

6. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pilot light was not lit while the emissions unit was in operation;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the operation of the flare into compliance with the acceptable operating criteria, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AG (P034)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AG (P034): production of specialty additives through gelation using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the two reactor systems are controlled by a condenser (AG-5 RCond) followed by an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the condenser, carbon adsorber or incinerator(s), in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the condenser and carbon adsorber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the condenser and carbon adsorber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the temperature of the exhaust gases of the condenser during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s).

Unless the control efficiency of the condenser is assumed to be zero, the permittee shall collect and record the following information each day:

a. the average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the temperature of the exhaust gases of the condenser exceeds the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the temperature of the exhaust gases of the condenser below the maximum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average temperature of the exhaust gases from the condenser, for any 3-hour block of time, is not more than 11 degrees Fahrenheit above the average temperature, as specified by the manufacturer.

If the control efficiency of the condenser is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the condenser, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the temperature of the exhaust gases of the condenser was below the required level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the temperature level of the exhaust gases of the condenser into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the condenser (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the condenser shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AH (P035)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AH (P035): production of lubricant additives through water-based blending using six reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the six reactor systems are controlled by a wet scrubber using water as the scrubbing solution (P-2 WScrb).	OAC rule 3745-21-09(LL)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The total VOC emissions not controlled by an incinerator or flare shall not exceed five tons per rolling twelve-month period. The total VOC emissions not controlled by an incinerator or flare shall be based on the emissions from all process vent streams.

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate for all final products generated (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AI (P036)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AI (P036): production of lubricant additives through corrosive inorganic and organic reactions using three reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the three reactor systems are controlled by either a carbon adsorber (O-1 or P-3 CDrum) or an incinerator (AC-6/7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions shall be controlled by an incinerator that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the incinerator(s) or carbon adsorber(s), in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the carbon adsorber(s), in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of either carbon adsorber O-1 or P-3, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

g. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

If the control efficiency of the carbon adsorber is always assumed to be zero, and compliance with the emission limitation of 5 tons per rolling, 12-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the carbon adsorber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of 5 tons per rolling, 12-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall monitor and record the concentration level of the organic compounds in the carbon adsorption system's exhaust stream daily, or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permittee shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of the carbon adsorption system is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to determine the control efficiency of carbon adsorber O-1 and P-3 (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of carbon adsorber O-1 and P-3 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

3. Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack A/B 8 (P038)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack A/B 8 (P038): loading of lubricant additives to tank cars.	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.d. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 23.0 pounds per hour. This short-term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 5.3 tons per year from emissions unit P038. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) at this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive materials that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions unit P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emission units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid; and

d. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for emission units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 23.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 5.3 tons of VOC emissions per year from P038

Applicable Compliance Method: Compliance with the emissions limit (YR VOC) shall be determined by the following equation:

YR VOC = (46,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

46,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case liquid loaded and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 1.45, saturation factor for splash filling from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emission units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack A 11 (P039)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack A 11 (P039): loading of lubricant additive to tank cars.	OAC Rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.d. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC Rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short-term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 2.7 tons per year from emissions unit P039. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) at this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive materials that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded at emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid; and

d. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 12.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 2.7 tons of VOC emissions per year from P039

Applicable Compliance Method: Compliance with the emissions limit (YR VOC) shall be determined by the following equation:

YR VOC = (23,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

23,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case liquid loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 1.45, saturation factor for splash filling from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 8-9-10 (P040)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 8-9-10 (P040): loading of lubricant additive, anglamol and gasoline additive to tank cars, controlled by a carbon adsorber (R CDrum 1).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 170.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions unit P040 and 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.d All loading of anglamols shall be accomplished in such a manner that displaced vapors and gases shall be vented to a carbon adsorption system. The carbon adsorption system shall be operated with sufficient volumetric flow at the point(s) of capture to minimize or eliminate odor emissions. Upon detection of any break through of odors from the carbon adsorption system, the permittee shall immediately recharge/replace the system with fresh carbon.

2.e All loading of gasoline additives shall be accomplished either through a submerged fill loading line or shall be bottom loaded.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded in this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded at emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (LL)(MTL / 1000)(1-C)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading anglamols.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall record daily any time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. an identification of each time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point;

e. an identification of any time period that anglamols were loaded and the carbon adsorption system was not used to control the emissions; and

f. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: 170.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor for splash fill from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions unit P040, and 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 11 (P041)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 11, bays C11, D11 (P041): loading of lubricant additives, anglamol and gasoline additives to tank cars, tank trucks and iso containers, controlled by a carbon absorber (R CDrum 1).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.f. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 90.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 21.0 tons per year from emissions unit P041. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit without the use of air pollution control equipment; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.e All loading of anglamols shall be accomplished in such a manner that displaced vapors and gases shall be vented to a carbon adsorption system. The carbon adsorption system shall be operated with sufficient volumetric flow at the point(s) of capture to minimize or eliminate odor emissions. Upon detection of any break through of odors from the carbon adsorption system, the permittee shall expediently recharge/replace the system with fresh carbon.

2.f All loading of gasoline additives shall be accomplished either through a submerged fill loading line or shall be bottom loaded.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded in this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading anglamols.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall record daily any time period that loading of gasoline additives was accomplished either through a submerged fill loading line or a bottom loading point.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid.

d. an identification of each time that displaced vapors and gases were not vented to the carbon adsorption system while loading anglamols;

e. an identification of each time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point; and

f. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emissions Limitation: 90.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation 21.0 tons of VOC emissions per year from P041

Applicable Compliance Method: Compliance with the emissions limit (YR VOC) shall be determined by the following equation:

YR VOC = [(23,000 gal/d)*(365 d/yr)*(2.63 lb/1000 gal loaded)*(ton/2000 lbs)] + [(23,000 gal/d)*(365 d/yr)*(2.36 lb/1000 gal loaded)*(ton/2000 lbs)]

where:

23,000 is the maximum gallons of liquid loaded per day at each bay in this loading rack; and 2.63 lbs/1000 gal loaded is the loading loss of the worst case liquid loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 0.5, saturation factor for submerged fill from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 3.62, true vapor pressure of the liquid, in psia;
M= 74, molecular weight of vapors, in lb/lb-mol;
T= 635, bulk temperature of liquid loaded, in degrees Rankin;

and:

2.36 lbs/1000 gal loaded is the loading loss of the second worst case liquid loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 0.5, saturation factor for submerged fill from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 2.24, true vapor pressure of the liquid, in psia;
M= 120, molecular weight of vapors, in lb/lb-mol; and
T= 710, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 12 (P042)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 12, bays C12 and D12 (P042): loading of recovered materials, waste materials and lubricant additives to tank cars. Bay C12 is controlled by a fume incinerator (AC-6 or AC-7 Fm Inc's).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 47.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 8.3 tons per year from emissions unit P042. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit without the use of air pollution control equipment; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.e Loading of sodium hydro sulfide (a recovered material) at bay C12 of loading rack C/D 12 shall be accomplished in such a manner that all displaced vapors and gases shall be vented to a caustic scrubber which discharges to fume incinerator AC-6 or AC-7.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded in this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded at emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/ 2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. Fume incinerator AC-6 and AC-7 shall be operated and maintained in accordance with the design specifications, including:

a. monitoring and recording the temperature and percent oxygen in AC-6 incinerator continuously; and

b. continuously monitoring the temperature in AC-7 incinerator.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall record daily any time period that all displaced vapors and gases were not vented to the caustic scrubber and then to fume incinerator AC-6 or AC-7 while loading of sodium hydro sulfide.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. an identification of each time period that all displaced vapors and gases were not vented to the caustic scrubber and then to fume incinerator AC-6 or AC-7 while loading of sodium hydro sulfide; and

e. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emissions Limitation: 47.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 8.3 tons of VOC emissions per year from emissions unit P042

Applicable Compliance Method: Compliance with the rolling, 12-month emissions limit (YR VOC) shall be determined by the following equation:

YR VOC = (23,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs) + (20,000 gal/d)*(365 d/yr)*(1.29 lbs/1000 gal loaded)*(ton/2000 lbs)

where:

23,000 is the maximum gallons of liquid loaded per day at each bay of this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and 1.29 lbs/1000 gal loaded is the loading loss of the worst case waste material loaded and are calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

for waste material:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.358, true vapor pressure of the liquid, in psia;
M= 106, molecular weight of vapors, in lb/lb-mol; and
T= 530, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 15 (P043)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 15, bays C15 and D15 (P043): loading of lubricant additives to tank cars, controlled by a flare (AE-7 Flare).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.g. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 23.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 5.3 tons per year from emissions unit P043. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit without the use of air pollution control equipment; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.e Hydrogen chloride (HCl) emissions shall not exceed 8.30 pounds per hour.

2.f HCl emission shall not exceed 5.0 tons per year from emissions unit P043.

2.g All loading of the lubricant additive currently stored in storage tank 801 (emissions unit T048) in loading rack D 15 (emissions unit P043) shall be accomplished in such a manner that all displaced vapors and gases shall be vented to a water scrubber which discharges to elevated flare AE-7. This flare is used as a control device for existing emissions unit P032. If, at any time, the material currently stored in storage tank 801 is moved to a different storage tank, the emission control system described above must continue to be used while loading from the new storage tank.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

4. The flare shall be operated and maintained in accordance with design specifications, including:

a. operate the flare in a smokeless condition;

b. monitoring the pilot light continuously for flame out; and

c. maintaining a manual re-ignition system for the pilot light.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive materials that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall collect and record each month the following information for emissions units P043:

a. the throughput of each type of liquid containing HCl, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of fume destruction used for each type of liquid loaded and the estimated overall control efficiency, in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol; and

f. the bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall record every month the HCl emissions (MHCl) from each liquid loaded in emissions unit P043, according to the following equation:

MHCl = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL);

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system; and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

7. The permittee shall record daily any time period that displaced vapors and gases were not vented to the water scrubber and then to the elevated flare AE-7 while loading lubricant additive from tank 801 (emission unit T048).

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall record the following information each day:

a. all periods during which the pilot flame was out;

b. the operating times for the flare, monitoring equipment, and the associated emissions unit when in operation and venting gases; and

c. the number of reactor processes vented to the flare.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

9. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 30 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. an identification of each time period that displaced vapors and gases were not vented to the water scrubber and then to the elevated flare AE-7 while loading lubricant additive from tank 801 (emission unit T048); and

e. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall also submit annual reports that summarize the following information for P043:

a. the annual throughput of each type of liquid containing HCl, in gallons per year; and

b. the HCl emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all periods during which the flare pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period, as well as the cause of each deviation.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall submit quarterly reports which include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emissions Limitation: 23.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

HRTL= throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emissions Limitation: 5.3 tons of VOC emissions per year from P043

Applicable Compliance Method: Compliance with the rolling, 12-month emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (46,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

46,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly value calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.d Emissions Limitation: 8.30 pounds of HCl emissions per hour

Applicable Compliance Method: Compliance with the hourly HCl emissions limit (HRHCl) shall be determined by the following equation:

HR HCl= (HRTL/1000)(1-C)(LL)

where:

HRTL= throughput of each type of liquid, in gal/hr;
C= overall control efficiency of the emissions control system; and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.e Emissions Limitation: 5.0 tons of HCl emissions per year from emissions unit P043

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the sum of the monthly emission rate as recorded according to A.III.5 and A.III.6 for the calendar year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 200 T/F West (P044)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at the 200 Tank Farm West (P044): loading of lubricant additives to tank trucks and iso containers.	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.d. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 6.9 tons per year from emissions unit P044. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid; and

d. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 12.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL / 1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 6.9 tons of VOC emissions per year from P044

Applicable Compliance Method: Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and are calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rate calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 500 T/F East (P045)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at the 500 Tank Farm East (P045): loading of lubricant additives to tank trucks and iso containers, controlled by a fume incinerator (AC-6 or AC-7 Fm Inc.'s).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 22.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 13.0 tons per year from emissions unit P045. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit without the use of air pollution control equipment; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.e There are two (2) loading arms at this loading rack. One loading arm is only used for loading of the lubricant additives currently stored in storage tanks 573, 594, 595, 596, 597, 598 and 599, (emissions units T201, T206, T207, T171, T208-210). Loading with this arm shall be accomplished in such manner that all displaced vapors and gases shall be vented to a caustic scrubber (Z-13) which discharges to the atmosphere. If at any time the material currently stored in storage tanks 573, 594, 595, 596, 597, 598, or 599 is moved to a different storage tank, the emission control system described above must continue to be used while loading from the new storage tank.

The other loading arm is for the loading of lubricant additives currently stored in storage tanks 555, 557, 558, 574, 577, 618, and 639 (emissions units T129, T199, T200, T202, T203, T058 and T071) which are loaded with a standard splash fill loading arm and vented to the atmosphere.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall record daily any time period that displaced vapors and gases were not vented to the caustic scrubber (Z-13) while loading material from storage tanks 573, 594, 595, 596, 597, 598, and 599 (emissions units T201, T206, T207, T171, T208-210).

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. an identification of each time period that displaced vapors and gases were not vented to the caustic scrubber (Z-13) while loading material from storage tanks 573, 594, 595, 596, 597, 598, and 599 (emissions units T201, T206, T207, T171, T208-210); and

e. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 22.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 13.0 tons of VOC emissions per year from P045

Applicable Compliance Method: Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(1.18 lbs/1000 gal loaded)*(tons/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 1.18 lbs/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.61, true vapor pressure of the liquid, in psia;
M= 60, molecular weight of vapors, in lb/lb-mol; and
T= 560, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 700 T/F East (P046)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at 700 Tank Farm East (P046): loading of lubricant additives to tank trucks and iso containers.	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.d. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 6.9 tons year from emissions unit P046. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040. P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall record daily any time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid; and

d. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 11.3 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limitation (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 6.9 tons of VOC emissions per year from emissions unit P046

Applicable Compliance Method: Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limitation shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 700 T/F North (P047)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at the 700 Tank Farm North (P047): loading of recovered material to tank trucks and iso containers, controlled by a wet scrubber (702/3 Scrb).	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.g. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Hydrochloric acid (HCl) emissions shall not exceed 1.40 pounds per hour.

2.c HCl emissions shall not exceed 0.9 ton per year.

2.d All loading of hydrochloric acid (a recovered material) at this emissions unit shall be accomplished in such a manner that all displaced vapors and gases shall be vented to a water scrubber as a means to control hydrogen chloride vapors.

2.e Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.f VOC emissions shall not exceed 6.9 tons per year from emissions unit P047. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.g VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) in this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The pH of the scrubber liquor shall be maintained above 7.5.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

4. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040. P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall collect and record each month the following information for emissions unit P047:

a. the throughput of each type of liquid containing HCl, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of fume destruction used for each type of liquid loaded and the estimated overall control efficiency, in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol; and

f. the bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall record every month the HCl emissions (MHCl) from each liquid loaded at emissions unit P047, according to the following equation:

MHCl = the sum, from i=1 to i=n, of (MTL/1000)(1-C)(LL);

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system; and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

7. The permittee shall collect and record the following information each day:

a. a log or record of the pH of the scrubber liquor; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

8. The permittee shall record daily any time period that displaced vapors and gases were not vented to the water scrubber as a means to control hydrogen chloride vapors.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above; and

e. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall also submit annual reports that summarize the following information for emissions unit P047:

a. the annual throughput of each type of liquid containing HCl, in gallons per year; and

b. the HCl emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all periods of time during which emission vapors and gases were not vented to the water scrubber as a means to control hydrogen chloride vapors.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 12.0 pounds of VOC emissions per hour

Applicable Compliance Method:Compliance with the hourly VOC emissions limitation (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 6.9 tons of VOC emissions per year from emissions unit P047

Applicable Compliance Method: Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly value calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.d Emissions Limitation: 1.40 pounds of HCl emissions per hour

Applicable Compliance Method: Compliance with the hourly HCl emissions limitation (HRHCl) shall be determined by the following equation:

HR HCl= (HRTL/1000)(1-C)(LL)

where:

HRTL= throughput of each type of liquid, in gal/hr;
C= overall control efficiency of the emissions control system; and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emissions Limitation: 0.9 ton of HCl emissions per year from emissions unit P047.

Applicable Compliance Method: Compliance with this emission limit shall be determined by summing the monthly emission rates as recorded according to A.III.5 and A.III.6 for the calendar year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 800 T/F South (P048)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at 800 Tank Farm South (P048): loading of lubricant additives to tank trucks and iso containers.	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.d. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 6.9 tons per year from emissions unit P048. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) at this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded in emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emissions limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid; and

d. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 12.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limitation (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation from AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 6.9 tons of VOC emissions per year from emissions unit P048

Applicable Compliance Method Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(ton/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

for lubricant additive:
S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limitation shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack GEN III (P049)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack at Gen III (P049): loading of lubricant additives and gasoline additives to tank trucks and iso containers.	OAC rule 3745-31-05(A)(3) PTI 02-09105	See A.I.2.a. through A.I.2.e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile organic compound (VOC) emissions shall not exceed 12.0 pounds per hour. This short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c VOC emissions shall not exceed 6.9 tons per year from emissions unit P049. This long-term emission limitation for VOC is based on the maximum operating rate of this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.d VOC emissions shall not exceed 39.95 tons per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

2.e All loading of gasoline additives shall be accomplished either through a submerged fill loading line or shall be bottom loaded.

II. Operational Restrictions

1. The permittee shall not load more than 40,000 gallons of any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) at this loading rack during any one day.

[Authority for term: PTI 02-09105, OAC rule 3745-21-07(E) and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The maximum annual throughput in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly throughputs:

a. anglamols - 15 million gallons;
b. gasoline additives - 15 million gallons;
c. lubricant additives - 30 million gallons; and
d. waste and recovered materials - 5 million gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading losses for materials loaded in P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049 shall not exceed:

a. anglamols - 1.01 lbs VOC/ 1000 gallons loaded;
b. gasoline additives - 2.63 lbs VOC/ 1000 gallons loaded;
c. lubricant additives - 0.626 lbs VOC/ 1000 gallons loaded; and
d. waste and recovered material - 1.29 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive material that are loaded at this rack.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record each month the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the loading method for each type of liquid loaded;

c. the method of VOC destruction used for each type of liquid loaded and the estimated overall VOC control efficiency (if applicable), in percent;

d. the true vapor pressure of the liquid, in psia;

e. the molecular weight of vapors, in lb/lb-mol;

f. the bulk temperature of liquid loaded, in degrees Rankin; and

g. the throughput of each type of liquid for the previous 12-month period, in gallons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record every month the sum of VOC emissions (MVOC) from each liquid loaded at emissions units P038, P039, P040, P041, P041, P042, P043, P044, P045, P046, P047, P048 and P049, according to the following equation:

MVOC = the sum, from i=1 to i=n, of (MTL / 1000)(1-C)(LL)(ton/2000 lbs)

where:

i= each individual type of liquid loaded;
n= the total number of types of liquid loaded;
MTL= throughput of each type of liquid, in gal/month;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall record every month the rolling, 12-month summation of the VOC emissions from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined, for the previous, 12-month period, in tons.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall record daily any time period that loading of gasoline additives was accomplished in a manner other than either through a submerged fill loading line or a bottom loading point.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which the daily volatile photochemically reactive material loaded exceeded 40,000 gallons and the actual gallons loaded during each such day;

b. all exceedances of the rolling, 12-month VOC emission limitation for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P037, P048 and P049, combined;

c. all exceedances of the rolling, 12-month throughput limits for each type of liquid;

d. any time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point;

e. all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above; and

f. any monthly record showing that the loading loss for any liquid exceeded the maximum loading losses specified in A.II.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall also submit annual reports that summarize the following information for emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined:

a. the annual throughput of each type of liquid, in gallons per year; and

b. the total VOC emissions, in tons per year.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emissions limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emissions Limitation: 12.0 pounds of VOC emissions per hour

Applicable Compliance Method: Compliance with the hourly VOC emissions limit (HRVOC) shall be determined by the following equation:

HR VOC= (HRTL/1000)(1-C)(LL)

where:

HRTL= maximum throughput of each type of the worst case liquid, in gal/hr;
C= overall control efficiency of the emissions control system (if applicable); and
LL = the loading loss, in lb/103 gal of liquid loaded, and is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-09105, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emissions Limitation: 6.9 tons of VOC emissions per year from P049

Applicable Compliance Method: Compliance with the emissions limitation (YR VOC) shall be determined by the following equation:

YR VOC = (60,000 gal/d)*(365 d/yr)*(0.626 lb/1000 gal loaded)*(tons/2000 lbs)

where:

60,000 is the maximum gallons of liquid loaded per day at this loading rack; and 0.626 lb/1000 gal loaded is the loading loss of the worst case lubricant additive loaded and is calculated according to the following equation From AP-42, Section 5.2 (1/95):

LL= (12.46 SPM / T)

where:

S= 1.45, splash fill saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= 0.16, true vapor pressure of the liquid, in psia;
M= 130, molecular weight of vapors, in lb/lb-mol; and
T= 600, bulk temperature of liquid loaded, in degrees Rankin.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

1.c Emissions Limitation: 39.95 tons of VOC emissions per rolling, 12-month period from emissions units P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049, combined.

Applicable Compliance Method: Compliance with this emissions limit shall be determined by the monthly emission rates calculated in A.III.4. based on the record keeping specified in A.III.2 and A.III.3.

[Authority for term: PTI 02-09105 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AK (P050)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AK (P050): production of chemical additives for lubricating oils using a reactor, filter and finish and receiver tanks. Volatile organic compound (VOC) emissions are controlled by one of two wet scrubbers using water as the scrubbing solution (AK-1 and AB-11 WScrb).	OAC rule 3745-31-05(A)(3) PTI 02-11590	VOC: 1.1 lbs/hr HCl: 0.86 lb/hr and 3.8 tons/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(LL)(3)(a).
HCl emissions are controlled by wet scrubber AK-1.	OAC rule 3745-21-09(LL)(3)(a)	VOC: 5 tons/rolling 12-month period

2. Additional Terms and Conditions

2.a Emissions of HCl shall be controlled by a packed column scrubber (AK-1).

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

1. The maximum hourly production rate shall not exceed 500 pounds per hour.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

2. The scrubber liquor of wet scrubber AK-1 (AK-1 WScrb) shall be maintained such that the solution will not exceed 13.0 percent weight hydrochloric acid. This is equivalent to a specific gravity of 1.064 at 15.6 degrees Celsius. Therefore, the operational range of the solution will be from a specific gravity of 1.000 to 1.064. Alternatively, the operating range shall be established during an emissions test that demonstrated that the emissions unit was in compliance with the HCl limit.

The scrubber liquor flow rate shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the wet scrubber.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirments specified in the terms and conditions for this emissions unit.

[Authority for term: PTI 02-11590, OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(A)(1)]

3. The scrubber water flow rate of wet scrubber AB-11 (AB-11 WScrb) shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the scrubber.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber, as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirments specified in the terms and conditions for this emissions unit.

[Authority for term: PTI 02-11590, OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-11590, issued on April 8, 1998: A.III.2. through A.III.7. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of pounds (lbs) of VOC emitted per ton of final product generated, or pounds (lbs) of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-11590, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in lbs of VOC/ton of final product generated or lbs of VOC/batch run);

e. the actual number of hours the emissions unit was in operation during the generation of each final product or during each batch run;

f. the VOC emission rate for each final product generated that was not controlled by the wet scrubber(s), in lbs per hour, using the following equation:

E (Uncontrolled) = [(quantity of final product, in tons, or number of batches run) x (emission factor, in lbs of VOC/ton of final product generated or lbs of VOC/batch run)] / (hours of operation)

g. the VOC emission rate for each final product generated that was controlled by either wet scrubber AK-1 or AB-11, in lbs per hour, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in lbs/hour) x (1 - (CE/100))

Where: CE = control efficiency of either wet scrubber AK-1 and AB-11, whichever is associated with that particular vent stream, as demonstrated during the most recent emissions test;

h. the total VOC emission rate for all final products generated (in lbs/hour, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

i. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (in tons, calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: PTI 02-11590, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

5. The permittee shall properly operate and maintain equipment to continuously monitor and record the specific gravity of the scrubber liquor and the scrubber water flow rate of wet scrubber AK-1 while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the specific gravity of the scrubber liquor, on a daily basis;

b. the scrubber water flow rate, in gallons per minute, on a daily basis; and

c. a log or record of operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate of wet scrubber AB-11 while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall collect and record the following information each day:

a. the scrubber water flow rate, in gallons per minute, on a daily basis; and

b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

7. The permittee shall record daily any time period that emissions of HCl were not vented to wet scrubber AK-1.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-11590, issued on April 8, 1998: A.IV.4. through A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the hourly production rate limitation.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: PTI 02-11590, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

4. Unless the control efficiency of wet scrubber AK-1 is assumed to be zero, the permittee shall submit specific gravity deviation (excursion) reports that identify all periods of time during which the specific gravity of the scrubber liquor and the scrubber liquor flow rate did not comply with the required levels specified above while the process vent stream was vented to the wet scrubber.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

5. Unless the control efficiency of wet scrubber AB-11 is assumed to be zero, the permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate was not maintained at or above the required levels while the process vent stream was vented to the wet scrubber.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall submit deviation (excursion) reports that identify all periods of time during which emissions of HCl were not vented to wet scrubber AK-1.

[Authority for term: PTI 02-11590 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation: 1.1 lbs of VOC per hour from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: PTI 02-11590, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

[Authority for term: PTI 02-11590, OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: 0.86 lb of HCl per hour

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 26 or 26A, or with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-11590, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation: 3.8 tons of HCl per year

Applicable Compliance Method: Compliance with the annual emission limitation above shall be determined by multiplying the maximum hourly HCl rate by 8,760 hours and dividing by 2,000 lbs/ton.

[Authority for term: PTI 02-11590, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl and to determine the control efficiency of wet scrubber AK-1 and AB-11 (unless assumed to be zero);

c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for HCl: Methods 26 or 26A of 40 CFR, Part 60, Appendix A;

d. the VOC control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of wet scrubbers AK-1 and AB-11 shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

e. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

f. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: PTI 02-11590, OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AL (P051)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AL (P051): production of speciality chemicals using three oxidation reactors and receiver tanks and a condenser. Volatile organic compound (VOC) emissions from each reactor and receiver tank are controlled by an incinerator (AC-6 or AC-7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. The condenser is an integral part of the process and is identified as recovery equipment and not as control equipment.	OAC rule 3745-31-05(A)(3) PTI 02-14125	VOC: 31.08 lbs/batch and 11.34 tons/year; See A.I.2.a. below. The requirements of this rule also include the requirements of OAC rule 3745-21-09(LL).
	OAC rule 3745-21-09(LL)	See A.I.2.b. and A.I.2.c. below.

2. Additional Terms and Conditions

2.a VOC emissions from the three oxidation reactors and receiver tanks shall be controlled at all times by an incinerator or a flare. VOC emissions from the receiver tanks shall be controlled at all times by an incinerator or a flare.

2.b The incinerator shall reduce VOC emissions by at least 98% by weight at all times, as determined by paragraph OAC rule 3745-21-10(C).

2.c Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(A)(1)]

2. The exhaust gas temperature on each of the condensers shall be connected to a high temperature shutdown switch which will stop air flow to the oxidation reactor(s) when activated.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-14125, issued on August 15, 2000: A.III.2. through A.III.4., and A.III.7. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted from the three oxidation reactors and receiver tanks, for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of pounds (lbs) of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-14125, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the emission factors used to determine the amount of VOC emitted from the three oxidation reactors and receiver tanks for each batch run (in lbs of VOC/batch run);

c. the VOC emission rate from the three oxidation reactors, for each batch controlled by the condenser and incinerator(s), in lbs of VOC per batch run, using the following equation:

E (Controlled) = (emission factor, in lbs of VOC/each batch) x (1 - (CE/100))

Where: CE = control efficiency of the condenser and incinerator(s) as demonstrated during the most recent emissions test; and

d. the total VOC emission rate from the reactors and receiving tanks, for all batches run (in lbs of VOC/each batch).

[Authority for term: PTI 02-14125, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall collect and record the following information for each month:

a. the name of each hazardous air pollutant (HAP) used in the emissions unit;

b. the amount of each HAP used in the emissions unit, in tons;

c. the HAP emissions for each HAP, from all materials employed, controlled by the incinerator(s), in tons per month, using the following equation:

E (Controlled) = (uncontrolled HAP emission rate, in tons/month) x (1 - (CE/100))

Where: CE = control efficiency of the incinerator(s) as demonstrated during the most recent emissions test;

d. the rolling, twelve-month summation of the monthly HAP emissions for all materials employed (in tons, calculated by summing the monthly HAP emissions for the preceding 11 months plus the VOC emissions for the current month); and

e. the total combined HAP emissions from all materials employed, in tons per month and tons per rolling 12-month period (the sum of each HAP emitted as determined in paragraphs A.III.4.c. and A.III.4.d).

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1600 degrees Fahrenheit; and

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(C)(1)]

7. The permittee shall record daily any time period that emissions of VOC from the three oxidation reactors and receiver tanks were not controlled by an incinerator.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-14125, issued on August 15, 2000: A.IV.2., A.IV.3. and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the lbs/batch VOC emission rate limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.e. of these terms and conditions and the number of batches run per year). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

[Authority for term: PTI 02-14125 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit deviation (excursion) reports that identify all periods of time during which emissions of VOC from the three oxidation reactors and receiver tanks were not controlled by an incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation: 31.08 pounds VOC per batch.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C) and by the record keeping required in Section A.III of these terms and conditions.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 11.34 tons VOC per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions (multiply lbs VOC/batch by the number of batches per year and divide by 2000 lbs/ton).

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: 98% destruction of VOC by the incinerator.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C) for fume incinerator AC-7. Compliance with the 98% destruction efficiency for fume incinerator AC-6 shall be demonstrated by emissions testing conducted in accordance with the terms and conditions for emissions unit P052. No additional testing shall be required for emissions unit P051 to comply with this emissions limitation for fume incinerator AC-6.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for VOC by the incinerator and the allowable mass emission rate for VOC;

c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: Methods 1-4, 25 or 25A of 40 CFR Part 60, Appendix A or an alternative U.S. EPA approved test method, with prior approval from the Ohio EPA;

d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the incinerator(s) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

e. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

f. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AM (P052)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AM (P052): production of specialty chemicals using eight reactors, eight raw material feed tanks, holding tanks and filters. Volatile organic compound (VOC) emissions from the reactors and holding tanks are controlled by either an incinerator (AC-6 or AC-7 Fm Inc's) or a flare (F-4 Flare). VOC emissions from the feed tanks and filters are not controlled. SO2 emissions are controlled by a wet scrubber using a caustic solution (C-4 CScrb).	OAC rule 3745-31-05(A)(3) (PTI 02-14200)	Volatile organic compounds (VOC) emissions shall not exceed the following: 130.8 lbs/day from reactors, holding tanks, feed tanks and filters 16.14 tons per rolling, 12-month period from reactors and holding tanks 4.29 tons per rolling, 12-month period from feed tanks 4.43 tons per rolling, 12-month period from filters The requirements of this rule also include the requirements of OAC rule 3745-31-05(D) and are less stringent than OAC rule 3745-21-09(LL). The short term emission limitation for VOC was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit. Sulfur dioxide (SO2) emissions shall not exceed 21.05 lbs/hr and 15.6 tons per year.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 24.86 tons per rolling, 12-month period from reactors, holding tanks, feed tanks and filters.
	OAC rule 3745-21-09(LL)	See sections A.I.2.a through A.I.2.e below.
	OAC rule 3745-18-06(E)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The VOC emissions from the reactors and holding tanks shall be controlled at all times by an incinerator or a flare. VOC emissions from the feed tanks and filters are not controlled.

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c The incinerator shall reduce VOC emissions by at least 98% by weight at all times, as determined by paragraph OAC rule 3745-21-10(C).

2.d The flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.d.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

2. Additional Terms and Conditions (continued)

vi. Excluded from the requirements of paragraph A.I.2.d.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

(a) The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

(b) The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.e Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.f SO2 emissions from all of the reactor tanks generated when processing sulfur-containing raw materials shall be controlled by the scrubber prior to exhausting to the flare.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(A)(1)]

2. A pilot flame shall be maintained in the flare's pilot light burner at all times the process vent stream is vented to the flare.

[Authority for term: PTI 02-14200, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(A)(1)]

3. This permittee shall operate and maintain the wet scrubber at all times the process vent stream is vented to the scrubber in accordance with the following parameters:

a. not less than 7.5 pH; and

b. not less than two gallons per minute caustic scrubber liquor flow rate.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(A)(1)]

4. Methanol batches shall be limited to 730 per year.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(A)(1)]

5. The maximum annual number of "solvent-containing" batches, excluding the methanol batches, shall not exceed 2,867, based upon a rolling, 12-month summation of the production rates ("solvent-containing" batches, except methanol-containing products, contain raw materials whose flash points are less than 170 degrees Fahrenheit).

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-14200, issued on January 18, 2001: A.III.2 through A.III.6, and A.III.11 through A.III.13. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted from the filters, feed tanks, reactors and holding tanks, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted from the filters, feed tanks, reactors and holding tanks for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate from the filters, feed tanks, reactors and holding tanks, for each of the final products generated, in which the VOC emissions were not controlled by the incinerator(s) or flare, in tons, using the following equation:

E = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run);

f. the total VOC emission rate from the filters, for all final products generated (in tons);

g. the total VOC emission rate from the feed tanks, for all final products generated (in tons);

h. the rolling, 12-month summation of the total VOC emissions from the filters, for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month);

i. the rolling, 12-month summation of the total VOC emissions from the feed tanks, for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month);

III. Monitoring and/or Record Keeping Requirements (continued)

j. the VOC emission rate from the reactors and holding tanks, for each final product generated, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

where: CE = control efficiency of either the incinerator(s) or flare, whichever is associated with that particular vent stream;

k. the total VOC emission rate from the reactors and holding tanks, for all final products generated (in tons);

l. the rolling, 12-month summation of the total VOC emissions from the reactors and holding tanks for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month); and

m. the rolling, 12-month summation of the total VOC emissions from the filters, feed tanks, reactors and holding tanks, combined, for all final products generated (determined by adding the values from sections A.III.4.h, A.III.4.i and A.III.4.l for all final products generated).

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall develop emission factors for the amount of SO2 emitted from the process, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for all products containing sulfur. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Ohio EPA Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch, in kg;

c. the processing time for each batch, in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The permittee shall maintain monthly records of the following information:

a. the number of "solvent-containing" batches;

b. the number of methanol batches;

c. the total number of batches;

d. beginning after the first 12 calendar months of operation following the issuance of the permit to install, the rolling, 12-month summation of the number of "solvent-containing" batches;

e. the controlled VOC emission rate for "solvent-containing" and "non-solvent-containing" batches (lbs/batch) from the reactors and holding tanks.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall collect and record the following information for each month:

a. the name of each Hazardous Air Pollutant (HAP) used in the emissions unit;

b. the amount of each HAP used in the emissions unit, in tons;

c. the HAP emission rate for each HAP, from all materials employed, that was not controlled by the condenser or incinerator(s), in tons per month, using the following equation:

E (Uncontrolled) = (amount of each HAP, in tons)/(month)

d. the HAP emissions for each HAP, from all materials employed, controlled by the condenser and incinerator(s), in tons per month, using the following equation:

E (Controlled) = (uncontrolled HAP emission rate, in tons/month) x (1 - (CE/100))

where: CE = control efficiency of the condenser and incinerator(s) as demonstrated during the most recent emissions test;

e. the total HAP emission rate (in tons of HAP/month, determined by adding the values from A.III.8.c and A.III.8.d from all materials employed);

f. the rolling, 12-month summation of the monthly HAP emissions for all materials employed (in tons, calculated by summing the monthly HAP emissions for the preceding 11 months plus the VOC emissions for the current month); and

g. the total combined HAP emissions from all materials employed, in tons per month and tons per rolling, 12-month period (the sum of each HAP emitted as determined in paragraphs A.III.8.e and A.III.8.f).

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

9. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,600 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and venting gases.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

10. The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall record the following information each day:

a. all periods during which the pilot flame was out; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit when in operation and venting gases.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

11. The permittee shall monitor the pH of the scrubber liquor and properly operate and maintain equipment to continuously monitor the scrubber liquor flow rate of the wet scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. the pH of the scrubber liquor, before and after each batch and once during the batch (if the scrubber liquor is changed after each batch, the pH may be collected and recorded once at the end of each batch run);

b. the scrubber liquor flow rate, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

12. A statement of certification of the existing continuous SO2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director and Ohio EPA Northeast District Office upon request.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

13. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-14200, issued on January 18, 2001: A.IV.2 through A.IV. 6, A.IV.9, A.IV.11 through A.IV.13. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of each of the rolling, 12-month emission limitations for VOC emissions from the filters, feed tanks, and reactors and holding tanks.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total VOC emissions from the filters, feed tanks, reactors and holding tanks, combined.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the five tons per rolling, 12-month emission limitation for VOC emissions not controlled by an incinerator or flare.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the pound per hour emission limitation for SO2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC and SO2 emissions, in tons, for this emissions unit (as determined by record keeping required under A.III.4.f, A.III.4.g and A.III.4.k for VOC; A.III.6.f multiplied by the maximum possible operating days (365 days/yr), and divided by 2000 (lbs/ton) for SO2). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

8. The permittee shall submit deviation (excursion) reports that identify all periods during which the flare pilot flame was not functioning properly while the process vent stream was vented to the flare. The reports shall include the date, time, and duration of each such period, as well as the cause of each deviation.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

9. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels while the process vent stream was vented to the caustic scrubber:

a. the pH of the caustic scrubber liquor; and

b. the scrubber liquor flow rate.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

10. The permittee shall submit deviation (excursion) reports that identify all periods during which the scrubber was not operated during the processing of sulfur-containing raw materials.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

11. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare serving this emissions unit, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the Ohio EPA Northeast District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

12. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation: 130.8 lbs VOC per day from the filters, feed tanks, reactors and holding tanks.

Applicable Compliance Method: The short term emission limitation for VOC established in section A.I.1 above was established to reflect worst case conditions when operating at or near maximum capacity; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 16.14 tons VOC per year from the reactors and holding tanks.

Applicable Compliance Method: Compliance with the stated VOC emission limitation shall be determined by using the results of the emissions testing specified in section A.V.2. and by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: 4.29 tons VOC per year from the feed tanks.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation: 4.43 tons VOC per year from the filters.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emission Limitation: 98% destruction of VOC by the incinerator.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C) for fume incinerator AC-6. Compliance with the 98% destruction efficiency for fume incinerator AC-7 shall be demonstrated by emissions testing conducted in accordance with the terms and conditions for emissions unit P051. No additional testing shall be required for emissions unit P052 to comply with this emissions limitation for fume incinerator AC-7.

[Authority for term: PTI 02-14200, OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

1.f Emission Limitation: 24.86 tons VOC per rolling, 12-month period.

Applicable Compliance Method: Compliance with the stated VOC emission limitation shall be determined by using the results of the emissions testing specified in section A.V.2. and by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

1.g Emission Limitation: 21.5 lbs SO2 per hour.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing of the flare using the procedures specified in OAC rule 3745-18-04(A) and test Method 6 or 6C of 40 CFR, Part 60, Appendix A and by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-14200, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.h Emission Limitation: 15.6 tons SO2 per year.

Applicable Compliance Method: This limit is based on the allowable hourly emission limit (3.58 lbs/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[Authority for term: PTI 02-14200 and OAC rule 3745-77-07(C)(1)]

1.i Emission limitation: The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

Applicable Compliance Method: If required, Method 22 of 40 CFR, Part 60, Appendix A.

[Authority for term: PTI 02-14200, OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for VOC by the incinerator and the allowable mass emission rates for VOC and SO2; and to determine the control efficiency of the wet scrubber;

c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC: Methods 1-4, 25 or 25A of 40 CFR Part 60, Appendix A or an alternative U.S. EPA approved test method, with prior approval from the Ohio EPA; for SO2, Method 6 or 6C of 40 CFR, Part 60, Appendix A;

d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber and incinerator(s) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

e. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

f. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AM (P052): production of specialty chemicals using eight reactors, eight raw material feed tanks, holding tanks and filters. Volatile organic compound (VOC) emissions from the reactors and holding tanks are controlled by either an incinerator (AC-6 or AC-7 Fm Inc's) or a flare (F-4 Flare). VOC emissions from the feed tanks and filters are not controlled. SO2 emissions are controlled by a wet scrubber using a caustic solution (C-4 CScrb).		See section A.III.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit [P052] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (mineral spirits)
TLV (mg/m3): 525
Maximum Hourly Emission Rate (lbs/hr): 137.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10,723
MAGLC (ug/m3): 12,500

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process Z1 (P053)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process Z1 (P053): production of lubricant additives through the neutralization of thiophosphoryl compounds using four reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks. Volatile organic compound (VOC) emissions from the four reactor systems are controlled by an incinerator (AC-6 or AC-7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup.	OAC rule 3745-21-09(LL)	See A.I.2.a. through A.I.2.d. below.

2. Additional Terms and Conditions

2.a The VOC emissions from the three reactor systems shall be controlled by an incinerator or a flare that meets the requirements of paragraph OAC rule 3745-21-09(LL)(1)(a), unless otherwise exempted by OAC rule 3745-21-09(LL)(3).

2.b Total VOC emissions not controlled by an incinerator or a flare shall not exceed five tons per rolling twelve-month period, pursuant to OAC rule 3745-21-09(LL)(3)(a). The total VOC emissions not controlled by an incinerator or a flare shall be based on the emissions from all process vent streams.

2.c Unless exempted by OAC rule 3745-21-09(LL)(3)(b), the incinerator shall be designed and operated as follows:

i. The incinerator shall reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight or shall emit VOC at a concentration not exceeding twenty parts per million by volume (dry basis), either of which is determined under OAC rule 3745-21-10(C); or

ii. The incinerator shall provide a minimum residence time of 0.75 second at a minimum temperature of sixteen hundred degrees Fahrenheit.

2.d Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s), in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run);

f. the total VOC emission rate, for all final products generated, in which the VOC emissions were not controlled by the flare(s), in tons; and

g. the rolling, twelve-month summation of the monthly VOC emissions, for all final products generated, in which the VOC emissions were not controlled by the incinerator(s) (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain equipment to continuously monitor and record the average combustion temperature within the thermal incinerator during operation of this emissions unit, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the average combustion temperature specified below or less than the average combustion temperature specified by the manufacturer; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the average combustion temperature deviates from the average combustion temperature specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (minutes) during which there was a deviation, the average combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, is not less than 1,600 degrees Fahrenheit, or shall meet the manufacturer's design specifications for temperature.

This temperature level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the temperature level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.f. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the average combustion temperature within the thermal incinerator was less than 1600 degrees Fahrenheit or less than the average combustion temperature specified by the manufacturer;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average combustion temperature within the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly summaries that include a log of the downtime for the thermal incinerator when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the incinerator(s).

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Compliance for fume incinerators AC-7 and AC-6 shall be demonstrated by the testing conducted for emissions units P051 and P052. No additional testing shall be required for this emissions unit to comply with this emission limitation.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AB1 (P054)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AB1 (P054): production of lubricant additives through neutralization with inorganic bases using two reactor systems. Each reactor system may contain all or some of the following: reactors, filters, filter tanks, holding tanks, charging tanks, drying tanks and neutralization tanks.	OAC rule 3745-21-09(LL)	See A.I.2.a. and A.I.2.b. below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.c. below.
	OAC rule 3745-17-11(B)	PE: 3.07 lbs/hr
Volatile organic compound (VOC) and particulate emissions from the two reactor systems are controlled by a wet scrubber using water as the scrubbing solution (AB-11 WScrb).		

2. Additional Terms and Conditions

2.a The total VOC emissions not controlled by an incinerator or flare shall not exceed five tons per rolling twelve-month period. The total VOC emissions not controlled by an incinerator or flare shall be based on the emissions from all process vent streams.

2.b Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.c Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted, either for each final product generated or for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of tons of VOC emitted per ton of final product generated, or tons of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the quantity of each final product generated, in tons;

c. the number of batches run for each final product generated;

d. the emission factors used to determine the amount of VOC emitted for each final product generated (in tons of VOC/ton of final product generated or tons of VOC/batch run);

e. the VOC emission rate for each final product generated that was not controlled by the wet scrubber, in tons, using the following equation:

E (Uncontrolled) = (quantity of final product, in tons, or number of batches run) x (emission factor, in tons of VOC/ton of final product generated or tons of VOC/batch run)

f. the VOC emission rate for each final product generated that was controlled by the wet scrubber, in tons, using the following equation:

E (Controlled) = (uncontrolled VOC emission rate, in tons) x (1 - (CE/100))

Where: CE = control efficiency of the wet scrubber, as demonstrated during the most recent emissions test;

g. the total VOC emission rate for all final products generated (in tons, determined by adding the values from A.III.3.e. and A.III.3.f. for all final products generated); and

h. the rolling, twelve-month summation of the monthly VOC emissions for all final products generated (calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an annual report, by April 15 of each year for the preceding calendar year, that specifies the annual VOC emissions for this emissions unit (as determined by record keeping required under A.III.3.g. of these terms and conditions). This reporting obligation may be satisfied by the fee emissions report submitted by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factor for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C)(2), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-17-03(B)(1), and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: Particulate emissions shall not exceed 3.07 lbs per hour

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 2 years of issuance of the permit, or within 3 months of startup (if temporarily shutdown at the time of permit issuance), and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to detemine the control efficiency of the wet scrubber (unless assumed to be zero);

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) of the wet scrubber shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. the permittee shall demonstrate that the testing will be performed during the worst case emission conditions; and

e. the emission testing shall be conducted over an entire batch cycle.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10, and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack A/B 1-2-3 (P055)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack A/B 1-2-3 (P055): loading of lubricant additives and anglamols to tank cars, controlled by a carbon adsorber (R CDrum 2).	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC rule 3745-21-01) in this loading rack during any one day unless all displaced vapors and gases are vented to a carbon adsorption system that processes and recovers at least ninety per cent by weight of the vapors and gases.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that were loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading more than 40,000 gallons of volatile photochemically reactive materials in this loading rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

The permittee shall monitor and record the presence of any odors in the exhaust stream from the carbon adsorption system daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permitted shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons and the time period that the carbon adsorption system was not used to control the emissions; and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 90% by weight recovery of all vapor and gases by the carbon adsorber.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. in the event that more than 40,000 gallons per day of volatile photochemically reactive materials are loaded in this loading rack, emissions testing shall be conducted within 90 days of the loading and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the percent by weight recovery of all vapor and gases by the carbon adsorber;

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA; and

e. the permittee shall demonstrate that the testing will be performed for the worst case emission conditions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack A/B 6-7 (P056)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack A/B 6-7 (P056): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 4-5 (P057)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 4-5 (P057): loading of lubricant additives to tank cars, controlled by a carbon adsorber (R CDrum 1).	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC rule 3745-21-01) in this loading rack during any one day unless all displaced vapors and gases are vented to a carbon adsorption system that processes and recovers at least ninety per cent by weight of the vapors and gases.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that were loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading more than 40,000 gallons of volatile photochemically reactive materials in this loading rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

The permittee shall monitor and record the presence of any odors in the exhaust stream from the carbon adsorption system daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permitted shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons and the time period that the carbon adsorption system was not used to control the emissions; and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 90% by weight recovery of all vapor and gases by the carbon adsorber.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. in the event that more than 40,000 gallons per day of volatile photochemically reactive materials are loaded in this loading rack, emissions testing shall be conducted within 90 days of the loading and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the percent by weight recovery of all vapor and gases by the carbon adsorber;

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA; and

e. the permittee shall demonstrate that the testing will be performed for the worst case emission conditions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack Main (P058)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading main rack (P058): loading of lubricant additives, anglamols and gas additives to tank cars, controlled by a carbon adsorber (R CDrum 2).	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC rule 3745-21-01) in this loading rack during any one day unless all displaced vapors and gases are vented to a carbon adsorption system that processes and recovers at least ninety per cent by weight of the vapors and gases.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

1. All loading of gasoline additives shall be accomplished either through a submerged fill loading line or shall be bottom loaded.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that were loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading more than 40,000 gallons of volatile photochemically reactive materials in this loading rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall record daily any time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

The permittee shall monitor and record the presence of any odors in the exhaust stream from the carbon adsorption system daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permitted shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include:

a. an identification of each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons and the time period that the carbon adsorption system was not used to control the emissions; and the actual gallons loaded during each such day; and

b. an identification of each time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

2. The permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 90% by weight recovery of all vapor and gases by the carbon adsorber.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. in the event that more than 40,000 gallons per day of volatile photochemically reactive materials are loaded in this loading rack, emissions testing shall be conducted within 90 days of the loading and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the percent by weight recovery of all vapor and gases by the carbon adsorber;

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA; and

e. the permittee shall demonstrate that the testing will be performed for the worst case emission conditions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack G60 (P059)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack G60 (P059): loading of lubricant additives and anglamols to tank cars. Odors from the loading of anglamols shall be controlled by a carbon adsorber (P-3 CDrum).	OAC rule 3745-31-05(A)(3) PTI 02-16177	See A.I.2.a. through A.I.2.c. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E).
	OAC rule 3745-21-07(E)	See A.II.1. below.

2. Additional Terms and Conditions

2.a The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

2.b Volatile Organic Compound (VOC) emissions shall not exceed 27.36 pounds per day, based on a monthly average.

2.c VOC emissions shall not exceed 5.0 tons per year from this emissions unit.

II. Operational Restrictions

1. The permittee shall not load any volatile photochemically reactive material (as defined in OAC rule 3745-21-01) at this loading rack.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(A)(1)]

2. The maximum, average daily throughput of lubricant additives and anglamols in this emissions unit, combined, shall not exceed 12,000 gallons.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(A)(1)]

3. The maximum loading loss for materials loaded in this emissions unit shall not exceed 2.28 lbs VOC/1000 gallons loaded.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

4. The control efficiency of the carbon adsorber is assumed to be zero; therefore, it is not necessary to develop parametric monitoring, record keeping and reporting requirements to ensure compliance with the emission limitations.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of any volatile photochemically reactive materials that are loaded at this rack.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record monthly the following information:

a. the throughput of each type of liquid containing VOC, in gallons;

b. the true vapor pressure of the liquid, in psia;

c. the molecular weight of vapors, in lb/lb-mol;

d. the bulk temperature of liquid loaded, in degrees Rankin;

e. the VOC emissions from each liquid loaded in this emissions unit, calculated using the following equation

VOC emission rate (monthly) = (throughput, in gal/month) x (loading loss, in lbs/1000gal).

The loading loss of each liquid loaded is calculated according to the following equation:

LL= (12.46 SPM / T)

where:

S= saturation factor from AP-42 (1/95) Table 5.2.1, Saturation(s) Factors for Calculating Petroleum Liquid Loading Losses;
P= true vapor pressure of the liquid, in psia;
M= molecular weight of vapors, in lb/lb-mol; and
T= bulk temperature of liquid loaded, in degrees Rankin.

f. the total VOC emissions for all liquids loaded in this emissions unit, in lbs/month;

g. the number of days per month this emissions unit was in operation; and

h. the average daily emission rate (determined by dividing A.III.3.f. by A.III.3.g.).

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. an identification of each day during which volatile photochemically reactive material was loaded at this loading rack and the actual gallons loaded during each such day;

b. all exceedances of the maximum, average daily throughput limit specified in A.II.2;

c. all exceedances of the maximum loading loss specified in A.II.3; and

d. all exceedances of the average daily VOC emission limitation.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation: 27.36 pounds of VOC per day

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA approved test method.

[Authority for term: PTI 02-16177, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 5.0 tons of VOC per year

Applicable Compliance Method: Compliance shall be determined by dividing the sum of the monthly VOC emissions, in lbs, by 2000lbs/ton.

[Authority for term: PTI 02-16177 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack A/B 5 (P060)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack A/B 5 (P060): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 2-3 (P061)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 2-3 (P061): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C 6 (P062)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C6 (P062): loading of lubricant additives, anglamols and gas additives to tank cars, controlled by a carbon adsorber (R CDrum 2).	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC rule 3745-21-01) in this loading rack during any one day unless all displaced vapors and gases are vented to a carbon adsorption system that processes and recovers at least ninety per cent by weight of the vapors and gases.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

1. All loading of gasoline additives shall be accomplished either through a submerged fill loading line or shall be bottom loaded.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that were loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading more than 40,000 gallons of volatile photochemically reactive materials in this loading rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall record daily any time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

The permittee shall monitor and record the presence of any odors in the exhaust stream from the carbon adsorption system daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permitted shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include:

a. an identification of each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons and the time period that the carbon adsorption system was not used to control the emissions; and the actual gallons loaded during each such day; and

b. an identification of each time period that loading of gasoline additives was accomplished in a manner other than through a submerged fill loading line or a bottom loading point.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Emission Limitation: 90% by weight recovery of all vapor and gases by the carbon adsorber.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. in the event that more than 40,000 gallons per day of volatile photochemically reactive materials are loaded in this loading rack, emissions testing shall be conducted within 90 days of the loading and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the percent by weight recovery of all vapor and gases by the carbon adsorber;

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA; and

e. the permittee shall demonstrate that the testing will be performed for the worst case emission conditions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack C/D 7 (P063)

Activity Description: Tank Car Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Loading rack C/D 7 (P063): loading of lubricant additives to tank cars, controlled by a carbon adsorber (R CDrum 1).	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC rule 3745-21-01) in this loading rack during any one day unless all displaced vapors and gases are vented to a carbon adsorption system that processes and recovers at least ninety per cent by weight of the vapors and gases.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that were loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall record daily any time period that displaced vapors and gases were not vented to the carbon adsorption system while loading more than 40,000 gallons of volatile photochemically reactive materials in this loading rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The carbon adsorption system shall be continuously maintained to ensure that the existing carbon is replaced with fresh carbon immediately when breakthrough is indicated.

The permittee shall monitor and record the presence of any odors in the exhaust stream from the carbon adsorption system daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater.

The permitted shall monitor and record all periods when carbon breakthrough is detected. Existing carbon shall be replaced with fresh carbon immediately upon carbon breakthrough. As an alternative, the permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval, as determined by the maximum design flow rate and the organic concentration in the gas stream.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons and the time period that the carbon adsorption system was not used to control the emissions; and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify all periods during which the existing carbon is not replaced with fresh carbon immediately when breakthrough is indicated. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Emission Limitation: 90% by weight recovery of all vapor and gases by the carbon adsorber.

Applicable Compliance Method: Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. in the event that more than 40,000 gallons per day of volatile photochemically reactive materials are loaded in this loading rack, emissions testing shall be conducted within 90 days of the loading and within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the percent by weight recovery of all vapor and gases by the carbon adsorber;

c. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10;

d. testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA; and

e. the permittee shall demonstrate that the testing will be performed for the worst case emission conditions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-15-04(A), OAC rule 3745-21-10(C), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack Poly Plant (P064)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Poly Plant loading rack (P064): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack Bldg. 18 West (P065)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Building 18 West loading rack (P065): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 200 Ball House (P066)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Ball House 200 loading rack (P066): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 400 Ball House (P067)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Ball House loading rack 400 (P067): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 403 Tank (P068)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank 403 loading rack (P068): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack 458 Tank (P069)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank 458 loading rack (P069): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rack Bldg. 5/6 East (P070)

Activity Description: Tank Truck Loading Rack

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Building 5/6 East loading rack (P070): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Misc Bottom Loading (P071)

Activity Description: Miscellaneous bottom loading of tank cars and tank trucks.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous bottom loading rack (P071): loading of lubricant additives to tank cars.	OAC rule 3745-21-07(E)	See A.I.2.a. and A.I.2.b. below.

2. Additional Terms and Conditions

2.a The permittee shall not load more than 40,000 gallons of volatile photochemically reactive materials (as defined in OAC Rule 3745-21-01) in this loading rack during any one day.

2.b The permittee shall prevent liquid drainage from the loading arm when it is not in use or accomplish complete drainage before the loading arm is disconnected.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record daily the amount, in gallons, of all volatile photochemically reactive materials that are loaded in this rack.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the daily amount of volatile photochemically reactive materials loaded exceeded 40,000 gallons, and the actual gallons loaded during each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AN (P073)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AN (P073): production of specialty chemicals using one reactor system. A reactor system may contain all or some of the following: mix tanks, reactor, filter and finish tank. Volatile organic compound (VOC) emissions from the one reactor system are controlled by either an incinerator (AC-6 or AC-7 Fm Inc's), or a wet scrubber (C-4 CScrb) followed by a flare (F-4 Flare).	OAC rule 3745-31-05(A)(3) PTI 02-16572	VOC: 5.37 lbs/batch and 1.0 ton/year from all process vent streams controlled by the fume incinerator system and/or flare; 26.8 lbs/batch from all process vent streams not controlled by the fume incinerator system or flare. The requirements of this rule also include the requirements of OAC rule 3745-21-09(LL). SO2: 10 lbs/day and 1.8 tons/year.
SO2 emissions will result from the combustion of sulfur-containing organic compounds at the fume incinerator system and flare. Sulfur-containing organic compounds may be controlled by a wet scrubber (C-4 CScrb) prior to the flare.	OAC rule 3745-21-09(LL)	VOC: 5 tons/rolling 12-month period from all process vent streams not controlled by the fume incinerator system or flare; see A.I.2.a. through A.I.2.c. below.
	OAC rule 3745-18-06(E)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The incinerator(s) shall reduce VOC emissions by at least 98% by weight at all times, as determined by paragraph OAC rule 3745-21-10(C).

2. Additional Terms and Conditions (continued)

2.b The flare shall be designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours.

ii. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

iii. The flare shall be steam-assisted, air-assisted or non-assisted.

iv. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is non-assisted.

v. Except as provided in paragraph A.I.2.c.vi. of this permit, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, of less than sixty feet per second if the flare is steam-assisted or non-assisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

vi. Excluded from the requirements of paragraph A.I.2.c.v. of this permit is any steam-assisted or non-assisted flare that meets both of the following requirements:

a. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

b. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

2.c Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

2.d Any potential SO2 emissions above deminimis generated when processing sulfur-containing raw materials shall be controlled by the scrubber prior to exhausting to the flare.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator(s) shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(A)(1)]

2. A pilot flame shall be maintained at all times in the flare's pilot light burner.

[Authority for term: PTI 02-16572, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

3. This permittee shall operate and maintain the wet scrubber at all times the process vent stream is vented to the scrubber in accordance with the following parameters:

a. not less than 7.5 pH when using a caustic scrubber liquor;

b. not more than 6.5 pH when using Anthium dioxide; and

c. not less than two gallons per minute scrubber liquor flow rate.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-16572, issued on September 24, 2002: A.III.10. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted from the mix tanks, reactor, filter and finish tank, for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of pounds (lbs) of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-16572, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the number of batches run for each final product generated;

c. the emission factors used to determine the amount of VOC emitted from the mix tanks, reactor, filter and finish tank for each final product generated (in lbs of VOC/batch run);

d. the total VOC emission rate from all process vent streams controlled by the fume incinerator system and/or flare, for each of the final products generated, in lbs of VOC/batch run, using the following equation:

E (Controlled) = (emission factor, in lbs of VOC/each batch) x (1- (CE/100))

Where: CE = control efficiency of the incinerator(s) (as demonstrated during the most recent emissions test) or the caustic wet scrubber and flare, whichever is associated with that particular vent stream;

e. the monthly VOC emission rate from all process vent streams controlled by the fume incinerator system and/or flare, for all of the final products generated, in lbs, using the following equation:

E monthly = the sum, from i=1 to i=n, of (number of batches run)(lbs of VOC/batch run); where

i = each individual final product generated; and
n = the total number of final products generated per month;

f. the ton per year VOC emission rate from all process vent streams controlled by the fume incinerator system and/or flare, for all of the final products generated;

g. the total VOC emission rate from all process vent streams not controlled by the fume incinerator system or flare, for each of the final products generated (in lbs of VOC/batch run);

h. the total monthly VOC emission rate from all process vent streams not controlled by the fume incinerator system or flare, for all of the final products generated, in lbs, using the following equation:

E monthly = the sum, from i=1 to i=n, of (number of batches run)(lbs of VOC/batch run); where

i = each individual final product generated; and
n = the total number of final products generated per month; and

i. the rolling, twelve-month summation of the monthly VOC emissions from all process vent streams not controlled by the fume incinerator system or flare, for all final products generated (in tons, calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: PTI 02-16572, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall develop emission factors for the amount of SO2 emitted from the incinerator(s) and/or flare, either for each final product generated or for each batch run in this emissions unit. The emission factors shall be in units of pounds of SO2 emitted per ton of final product generated, or pounds of SO2 emitted per batch.

The permittee shall submit SO2 emission factors for all products containing sulfur. The specific methodology used to calculate the SO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all SO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall collect and record the following information monthly for each batch:

a. the company identification of each final product generated;

b. the quantity of each final product generated per batch in kg;

c. the processing time for each batch in hours;

d. the emission factor for sulfur compound emissions used to determine the amount of SO2 emitted from the process for each final product generated (in pounds/kg of final product generated or pounds/batch run);

e. the SO2 emission rate for each batch of final product generated after control or combustion devices, in pounds, using the following equation:

E=(quantity of product in kg or number of batches run) x (sulfur compound emission factor in lbs/kg or lbs/batch) x (conversion factor for lbs SO2/lb sulfur compound) x (1-CE/100))

Where:

CE= control efficiency of the control device removing sulfur compounds based on the most recent stack test data;

f. the total SO2 emission rate to the atmosphere for all final products generated, in pounds;

g. the number of hours per batch; and

h. the average hourly SO2 emission rate for each batch, in pounds per hour, and the maximum lb/hr SO2 emission rate accounting for the possibility of multiple batches being made simultaneously.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,600 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and venting gases.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

8. The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

a. all periods during which the pilot flame was out; and

b. the operating times for the flare, monitoring equipment, and the associated emissions unit when in operation and venting gases.

[Authority for term: PTI 02-16572, OAC rule 3745-21-09(LL) and OAC rule 3745-77-07(C)(1)]

9. The permittee shall monitor the pH of the scrubber liquor and properly operate and maintain equipment to continuously monitor the scrubber liquor flow rate of the wet scrubber while in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day the scrubber is used:

a. the pH of the scrubber liquor, before and after each batch and once during the batch (if the scrubber liquor is changed after each batch, the pH may be collected and recorded once at the end of each batch run);

b. the scrubber liquor flow rate, in gallons per minute, at the start of each batch; and

c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

10. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from the flare, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-16572, issued on September 24, 2002: A.IV.7 and A.IV.8. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the pounds per batch, tons per year and tons per rolling, 12-month period emission limitations for VOC.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify any exceedances of the pounds per day and tons per year emission limitations for SO2.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit deviation (excursion) reports that identify all periods during which the flare pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period, as well as the cause of each deviation.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

6. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels for the wet scrubber:

a. the pH of the scrubber liquor; and

b. the scrubber liquor flow rate.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

7. The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the flare, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) include all visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare. These quarterly reports shall be submitted to the appropriate Ohio EPA District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

8. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation: 5.37 lbs VOC per batch from all process vent streams controlled by the fume incinerator system and/or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factors for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: PTI 02-16572, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 1.0 ton VOC per year from all process vent streams controlled by the fume incinerator system and/or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: 98% destruction of VOC by the incinerator.

Applicable Compliance Method: Compliance shall be demonstrated by the testing conducted for emissions units P051 and P052 for fume incinerators AC-7 and AC-6, respectively. No additional testing shall be required for P073 to comply with this emission limitation.

[Authority for term: PTI 02-16572, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.d Emission Limitation: 26.8 lbs VOC per batch from all process vent streams not controlled by the fume incinerator system or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factors for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: PTI 02-16572, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.e Emission Limitation: 5 tons of VOC per rolling twelve-month period from all process vent streams not controlled by the fume incinerator system or flare.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

1.f Emission Limitation: 10.0 lbs SO2 per day.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, compliance shall be demonstrated by testing the amount of sulfur produced by this emissions unit prior to the fume incinerator system and flare using a U.S. EPA approved test method subject to the review and approval of the Ohio EPA Northeast District Office.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

1.g Emission Limitation: 1.8 tons SO2 per year.

Applicable Compliance Method: This limit is based on the allowable daily emission limit (10.0 lbs/day) multiplied by the maximum possible operating days (365 days/yr), and divided by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

[Authority for term: PTI 02-16572 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Process AO (P074)

Activity Description: Reactor Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Process AO (P074): production of specialty chemicals using two reactor systems. A reactor system may contain all or some of the following: hold tanks, reactor, filter and feed tanks. Volatile organic compound (VOC) emissions from the two reactors, filters and holding tanks are controlled by an incinerator (AC-6 or AC-7 Fm Inc's) followed by an emergency flare (S-4 Flare) as backup. VOC emissions from the material feed tanks are not controlled. Nitrogen dioxide (NO2) emissions will result from the combustion of nitrogen-containing organic compounds at the incinerator(s).	OAC rule 3745-31-05(A)(3) (PTI 02-17449)	VOC: 3.5 lbs/batch and 1.0 ton/year from all process vent streams controlled by the fume incinerator system; 17.5 lbs/batch from all process vent streams not controlled by the fume incinerator system. The requirements of this rule also include the requirements of OAC rule 3745-21-09(LL). NO2 emissions shall not exceeed 25 lbs/batch and 7 tons/year.
	OAC rule 3745-21-09(LL)	VOC emissions shall not exceed 5 tons/rolling, 12-month period from all process vent streams not controlled by the fume incinerator system. See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a The VOC emissions from the reactors, filters and holding tanks shall be controlled at all times by an incineratoror a flare. VOC emissions from the material feed tanks are not controlled.

2.b The incinerator(s) shall reduce VOC emissions by at least 98%, by weight, at all times, as determined by paragraph OAC rule 3745-21-10(C).

2.c Any process wastewater shall be discharged to a wastewater separator that has all separator sections equipped with covers and seals that minimize the amount of VOC exposed to the ambient air.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator(s) shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-17449, issued on April 3, 2003 and modified on March 25, 2004: A.III.2. and A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall develop emission factors for the amount of uncontrolled VOC emitted from the material feed tanks, reactors, filters and hold tanks, for each batch run in this emissions unit, and shall include emissions from flushing. The emission factors shall be in units of pounds (lbs) of VOC emitted per batch run.

The permittee shall submit VOC emission factors for all products produced in this emissions unit. The emission factors for the reaction vessels, and all other pieces of equipment associated with this emissions unit, shall be computed based on calculation methods from the Pharmaceutical NESHAP or other Ohio EPA-approved calculation methods. The specific methodology used to calculate the VOC emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all VOC emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Ohio EPA Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-17449, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall keep records of all materials used in this emissions unit for the purpose of determining the emission factors.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the number of batches run for each final product generated;

c. the emission factors used to determine the amount of VOC emitted from the material feed tanks, reactors, filters and hold tanks for each final product generated (in lbs of VOC/batch run);

d. the total VOC emission rate from all process vent streams controlled by the fume incinerator system, for each of the final products generated, in lbs of VOC/batch run, using the following equation:

E (Controlled) = (sum of emission factors, in lbs of VOC/each batch) x (1- (CE/100))

where: CE = control efficiency of the incinerator(s) (as demonstrated during the most recent emissions test);

e. the monthly VOC emission rate from all process vent streams controlled by the fume incinerator system, for all of the final products generated, in lbs, using the following equation:

E monthly = the sum, from i=1 to i=n, of (number of batches run)(lbs of VOC/batch run); where

i = each individual final product generated; and
n = the total number of final products generated per month;

f. the ton per year VOC emission rate from all process vent streams controlled by the fume incinerator system, for all of the final products generated (determined by multiplying A.III.3.e. by 12 months and dividing by 2000 lbs);

g. the total VOC emission rate from all process vent streams not controlled by the fume incinerator system, for each of the final products generated (in lbs of VOC/batch run);

h. the monthly VOC emission rate from all process vent streams not controlled by the fume incinerator system, for all of the final products generated, in lbs, using the following equation:

E monthly = the sum, from i=1 to i=n, of (number of batches run)(lbs of VOC/batch run);

where:

i = each individual final product generated; and
n = the total number of final products generated per month; and

i. the rolling, twelve-month summation of the monthly VOC emissions from all process vent streams not controlled by the fume incinerator system, for all final products generated (in tons, calculated by summing the monthly VOC emissions for the preceding 11 months plus the VOC emissions for the current month).

[Authority for term: PTI 02-17449, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall develop emission factors for the amount of NO2 emitted from the flare for each batch run in this emissions unit. The emission factors shall be in units of pounds of NO2 emitted per batch run.

The permittee shall submit NO2 emission factors for all products containing nitrogen. The specific methodology used to calculate the NO2 emissions, example calculations using the approved methodology, and the emission factors shall be submitted upon final issuance of this permit and shall be subject to the review and approval of the Ohio EPA Northeast District Office. Detailed calculations of all NO2 emission factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Ohio EPA Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factor.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

6. The permittee shall collect and record the following information for each month:

a. the company identification of each final product generated;

b. the number of batches run for each final product generated;

c. the emission factor used to determine the amount of NO2 emitted from the flare, for each final product generated using nitrogen-containing raw materials (in pounds of NO2/batch run);

d. the monthly NO2 emission rate from all process vent streams controlled by the flare, for all of the final products generated, in lbs, using the following equation:

E monthly = the sum, from i=1 to i=n, of (number of batches run)(lbs of NO2/batch run)

where:

i = each individual final product generated; and
n = the total number of final products generated per month; and

e. the ton per year VOC emission rate from all process vent streams controlled by the incinerator(s), for all of the final products generated (determined by multiplying A.III.5.d. by 12 months and dividing by 2000 lbs).

[Authority for term: PTI 02-17449, OAC rule 3745-21-09(LL), and OAC rule 3745-77-07(C)(1)]

7. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,600 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and venting gases.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any exceedances of the pounds per batch, tons per year and tons per rolling, 12-month period emission limitations for VOC.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the pounds per batch and tons per year emission limitations for NO2.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation: 3.5 lbs VOC per batch from all process vent streams controlled by the fume incinerator system.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required, the emission factors for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: PTI 02-17449, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation: 1.0 ton VOC per year from all process vent streams controlled by the fume incinerator system.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation: 17.5 lbs VOC per batch from all process vent streams not controlled by the fume incinerator system.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions. If required, the emission factors for a final product shall be determined by emissions testing using U.S. EPA reference Methods 25, 25A, or, with prior approval from the Ohio EPA, an alternative U.S. EPA-approved test method.

[Authority for term: PTI 02-17449, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation: 5 tons of VOC per rolling, 12-month period from all process vent streams not controlled by the fume incinerator system.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emission Limitation: 25 lbs NO2 per batch.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

1.f Emission Limitation: 7.0 tons NO2 per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in section A.III of these terms and conditions.

[Authority for term: PTI 02-17449 and OAC rule 3745-77-07(C)(1)]

1.g Emission Limitation: 98% destruction of VOC by the incinerator.

Applicable Compliance Method: Compliance shall be demonstrated by the testing conducted for emissions units P051 and P052 for fume incinerators AC-7 and AC-6, respectively. No additional testing shall be required for P074 to comply with this emission limitation.

[Authority for term: PTI 02-17449, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 232 (T013)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #232 (T013): 88,100-gallon capacity, outdoor, fixed-roof, vertical steel tank with submerged fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 404 (T022)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #404 (T022): 88,740-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 405 (T023)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #405 (T023): 88,740-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 458 (T034)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #458 (T034): 49,156-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 12 (T073)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #12 (T073): 154,000-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill for storing liquid organic materials or petroleum liquids. Vapors are controlled by a wet scrubber that uses water as the scrubbing solution (12tk WScrb).	OAC rule 3745-31-05(A)(3) (PTI 02-01747)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(D) and rule 3745-21-09(L).
	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall properly operate and maintain equipment to continuously monitor and record the scrubber water flow rate for the wet scrubber, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the flow rate on a continuous basis.

Whenever the monitored value for the flow rate falls below the level specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the scrubber water flow rate above the minimum level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable level for the scrubber water flow rate for the scrubber is not less than 2 gallons per minute.

This acceptable level is effective for the duration of this permit. If the acceptable level is not rule based, the permittee may request a revision. Any changes in the acceptable level must be approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the level based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the level will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

If the control efficiency of the wet scrubber is always assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric monitoring, record keeping and reporting for the wet scrubber as required under A.II, A.III and A.IV.

The provisions of this term shall not be applicable if the emission limitation of five tons per rolling twelve-month period has been exceeded. In such case, the permittee shall comply with the requirements of OAC rule 3745-21-09(LL)(1), as well as all monitoring, record keeping, and reporting requirements specified in the terms and conditions for this emissions unit.

[Authority for term: OAC rule 3745-21-09(LL)(1) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Unless the control efficiency of the wet scrubber is assumed to be zero, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the scrubber water flow rate was below the acceptable level;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable level, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 242 (T077)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #242 (T077): 169,657-gallon capacity, outdoor, fixed-roof, vertical steel tank with submerged fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3475-31-05(A)(3) (PTI 02-09822)	Volatile organic compound emissions shall not exceed 0.25 tons per year. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(D) and rule 3745-21-09(L).
	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b When storing petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), the vapor pressure of the petroleum liquid shall not be greater than 1.52 psia.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-09822, issued on January 18, 1996: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is a petroleum liquid, as defined in OAC rule 3745-21-01(E)(13), with a vapor pressure greater than 1.52 psia, or a volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7); and

c. the monthly throughput of liquid, in gallons.

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-09822, issued on January 18, 1996: A.IV.2. through A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the tons per year emission limitation for VOC.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-09822, issued on January 18, 1996: A.V.2.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC Rule 3745-77-07(A)(3)(a)(ii)]

2. Compliance with the allowable emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emissions Limitation: 0.25 tons per year of VOC emissions

Applicable Compliance Method: Compliance shall be demonstrated using the throughput data required in Section A.III of these terms and conditions, the storage tank dimensions, and U.S. EPA emission factors and equations found in AP-42, Section 7.1.3, "Emissions Factors for Organic Liquid Storage Tanks" (September 1997).

[Authority for term: PTI 02-09822 and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 465 (T122)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #465 (T122): 24,864-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the material is volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 462 (T123)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #465 (T123): 24,864-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the liquid organic material is volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 109 (T136)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #109 (T136): 13,200-gallon capacity, outdoor, fixed-roof, vertical steel tank with submerged fill and no vapor controls for storing liquid organic materials or petroleum liquids.	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored; and

b. whether or not the liquid organic material is volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7).

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Tank 159 (T186)

Activity Description: Storage Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Tank #159 (T186): 8,090-gallon capacity, outdoor, fixed-roof, vertical steel tank with splash fill for storing liquid organic materials or petroleum liquids. Vapors are controlled by an incinerator (AC-6/7 FM Inc's)	OAC rule 3745-31-05(A)(3) (PTI 02-7805)	Volatile organic compounds (VOC) emissions shall not exceed 0.25 ton per year. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(D) and rule 3745-21-09(L).
	OAC rule 3745-21-07(D) or OAC rule 3745-21-09(L)	See sections A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a When storing liquid organic materials, as defined in OAC rule 3745-21-01(C)(3), this emissions unit shall not store volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7).

2.b In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator(s) shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-7805, issued on December 7, 1994: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permitte shall maintain monthly records documenting the following information:

a. the type of liquid stored;

b. whether or not the liquid organic material is volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7); and

c. the monthly throughput of liquid, in gallons.

[Authority for term: OAC rule 3745-21-07(D) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,600 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and venting gases.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-7805, issued on December 7, 1994: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the tons per year emission limitation for VOC.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Ohio EPA Northeast District Office within 30 days of storing volatile photochemically reactive material in this emissions unit. The notification shall include the chemical name of the liquid being stored, the date of filling the tank with volatile photochemically reactive material, and the method of complying with the requirements of OAC rule 3745-21-07(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-7805, issued on December 7, 1994: A.V.2.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

2. Compliance with the allowable emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation: 0.25 ton per year of VOC emissions

Applicable Compliance Method: Compliance shall be demonstrated using the throughput data required in section A.III of these terms and conditions, the storage tank dimensions, and U.S. EPA emission factors and equations found in AP-42, section 7.1.3, "Emissions Factors for Organic Liquid Storage Tanks" (September 1997).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

****

THIS IS THE LAST PAGE OF THE PERMIT

****

Statement of Basis For Title V Permit

Company Name	The Lubrizol Corporation - Painesville Plant
Premise Number	02-43-00-0024
What makes this facility a Title V facility?	VOC and SO2
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **significant permit modification** per OAC rule 3745-77-08(C)(3)	**(Some of these changes by themselves would not have required a Sig. Mod.)** **Adding synthetic minor language for HAPs to avoid Subpart DDDDD for future boilers and Subpart FFFF requirements based on facility-wide restriction of HAPs emissions to 9.9 and 24.9 TPY.** B003 - PTI 02-19897 (mod. emissions unit to burn used oil) B009 - PTI 02-18165 (new emissions unit), this PTI did not include boiler MACT language, this mod. does. P052 - PTI 02-14200 (mod. emission unit to remove language restricting # of reactors vented to flare) P074 - PTI 02-17449 (mod. emission unit to reroute VOC emissions from flare to incinerator) T048 - should have been considered insignificant and has now been moved to Part II T186 - changed carbon adsorber language to incinerator language as it is now vented to an incinerator. For P006, P007, P011, P014, P015, P027, P028, P034, P036, P051, P053, P074: Made to look like P012, P013, and P030 where flare is indicated as emergency backup control to incinerator. For P001, P006, P026, P029, P052, and P073: SO2 record keeping language modified to allow for batch averaging per discussions with Jim O.

Part II (State and Federally Enforceable Requirements)		
Term and Condition (paragraph)	Basis	Comments

	SIP (3745-)	Other	
A.1.	N	Y	Chemical Accident Prevention Provisions, 40 CFR Part 68.
A.2. through A.15.	35-07		Synthetic minor emission limitations and associated monitoring, record keeping, and reporting to restrict HAPs emissions for future MACT avoidance.
A.16.	N	Y	40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart DDDDD

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001, B002, B004	20% opacity	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B001, B002, B004	PM: 0.020 lb/mmBTU	17-10(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B001, B002, B004	SO2: 1.6 lbs/mmBTU	18-06(D)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: quality of oil shall meet a sulfur content sufficient to comply with 1.6 lbs/mmBTU.
B003	PE: 0.26 lbs/mmBTU	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET not applicable.
B003	SO2: 1.6 lbs/mmBTU	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET not applicable.
B003	NOx: 9.27 lbs/hr / 40.6 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET not applicable.
B003	CO: 3.38 lbs/hr / 14.8 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET not applicable.
B003	20% opacity	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or use fuel oil.
B003	none	17-10(c)(1)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B003	none	18-06(D)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
B009	NOx: 1.76 lbs/hr / 7.73 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B009	CO: 1.48 lbs/hr / 6.49 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B009	20% opacity	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B009	PM: 0.020 lb/mmBTU	17-10(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B009	40 CFR Part 63, Subpart DDDDD	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
N001	20% opacity	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: the pressure drop across the baghouse shall be maintained within the range of 1.5 - 8 inches of water while the emissions unit is in operation.
N001	PM: 0.10 lb/100 lbs liquid, semi-solid, solid	-17-09		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: the pressure drop across the baghouse shall be maintained within the range of 1.5 - 8 inches of water while the emissions unit is in operation.
N001	SO2: 39.4 lbs/hr	-18-02(D)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall operate and maintain the wet scrubber at all times the process vent stream is vented to the scrubber in accordance with the following parameters: (a) not less than 2.9 pH; (b) not less than five gallons per 1000 cubic feet liquid-to-gas ratio; and (c) pressure drop not less than 3.5 inches of water.
N001	See 40 CFR 63.1203	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	40 CFR 63, Subpart EEE (MACT for Hazardous Waste Combustors)

P001 - P022 P025 - P036 P053, P054, P073 & P074	VOC: controlled by a flare that meets OAC rule 3745-21-09(DD)(10)(d), or by an incinerator that meets OAC rule 3745-21-09(LL)(1)(a)	-21-09(LL)(1)(a)/(b)		N	Y	Y	N	N	Y	N	Y	N	N	N	Unless otherwise exempt, per OAC 3745-21-09(LL)(3)(b): Reactor process vent stream is vented to an enclosed combustion device or a flare for which construction commenced prior to May 25, 1988. OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1600 degrees Fahrenheit; a pilot flame shall be maintained at all times in the flare's pilot light burner. ET: not applicable
P001 - P022 P025 - P036 P050, P052, P053, P054, P073 & P074	VOC: 5 tons/ rolling 12-month period if not controlled by flare or incinerator.	-21-09(LL)(3)(a)		N	N	Y	Y	N	Y	Y	Y	N	Y	Y	Monitoring St. for P050: A.III.2. through 4. Reporting St. for P050: A.IV.5. Monitoring St. for P052: A.III.2. through 4. Reporting St. for P052: A.IV.4. & 6. Misc.: If percent control efficiency of control equipment is assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric maintenance, monitoring and reporting as required under A.II, A.III and A.IV.
P001 - P022 P025 - P036 P050 - P054 P073 & P074	Process wastewater discharged to separator equipped with covers and seals which minimize VOC.	-21-09 (LL)(2)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp: no requirements established in SIP. ET: not applicable
P001 P026 P029	SO2: 19.05lbs/hr 29.62 lbs/hr 68.8 lbs/hr	-18-06(E)			N	Y			Y		Y		Y	N	

P006	SO2: 26.99lbs/hr SO2: controlled by caustic wet scrubber.	-18-06(E)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall operate and maintain wet scrubber G-3 (G-3 Scrb) at all times the process vent stream is vented to the scrubber in accordance with the following parameters: (a) not less than 7.00 pH; and (b) not less than two gallons per minute scrubber liquor flow rate.
P011 P012 P013 P014 P022 P030	SO2: 2.4 lbs/hr 160.0 lbs/hr 25.0 lbs/hr 10.0 lbs/hr 20.0 lbs/hr 30.0 lbs/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	Y	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000 Misc.: A statement of certification of the existing continuous SO2 monitoring system shall be maintained ...; permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system ...
P011 P012 P013 P014 P022 P030	Total hourly and annual SO2: 247.4 lbs/hr & 100 tons/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000
P024	20% opacity	-17-07		N	N	Y	N	N	Y	N	Y	N	Y	N	
P024	PE: 3.53 lbs/hr	-17-11		N	N	Y	N	N	Y	N	Y	N	Y	N	
P054	20% opacity PE controlled by wet scrubber (AB-11 WScrb).	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: scrubber water flow rate of the wet scrubber shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the scrubber.
P054	PE: 3.07 lbs/hr	-17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: scrubber water flow rate of the wet scrubber shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the scrubber.

P038 - P049	Prevent liquid drainage from loading arm when not in use or accomplish complete drainage before loading arm is disconnected.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET: not applicable
P038 - P049	VOC: 39.95 tons/rolling 12-month period from all emission units.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.
P038 P039 P040 P041 P042 P043 P044 P045 P046 P047 P048 P049	VOC: 23 lbs/hr 12 lbs/hr 170 lbs/hr 90 lbs/hr 47 lbs/hr 23 lbs/hr 12 lbs/hr 22 lbs/hr 12 lbs/hr 12 lbs/hr 12 lbs/hr 12 lbs/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.
P038 P039 P040 P041 P042 P043 P044 P045 P046 P047 P048 P049	VOC: 5.3 tons/yr 2.7 tons/yr 39.95 tons/yr 21 tons/yr 8.3 tons/yr 5.3 tons/yr 6.9 tons/yr 13 tons/yr 6.9 tons/yr 6.9 tons/yr 6.9 tons/yr 6.9 tons/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.

P040 & P041	Loading of anglamols accomplished so displaced vapors/gases be vented to carbon adsorption system: operated with sufficient volumetric flow; upon detection of break through, immediately recharge/ replace with fresh carbon.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P040, P041 & P049	Loading of gasoline additives accomplished either through submerged fill loading line or bottom loaded.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P042	Loading of sodium hydro sulfide accomplished such that all displaced vapors/gases be vented to caustic scrubber which discharges to fume incinerator AC-6 or AC-7.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable

P043 P047	HCl: 8.30 lbs/ hr & 5 tons/yr 1.4 lbs/hr & .9 ton/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.
P043 & P047	Displaced vapors/gases vented to a water scrubber which, for P043, discharges to elevated flare AE-7.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET: not applicable
P045	Displaced vapors/gases vented to a caustic scrubber (Z-13)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET: not applicable.
P050	VOC: 1.1 lbs/hr HCl: .86 lb/hr & 3.8 tons/yr	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: scrubber liquor of wet scrubber AK-1 (AK-1 WScrb) shall be maintained such that the solution will not exceed 13.0 percent weight hydrochloric acid. The scrubber water flow rate shall be continuously maintained at a value of not less than two gallons per minute. Monitoring St: A.III.2. through 7. Reporting St.: A.IV.4. & 6.
P050	HCl shall be controlled by a packed column scrubber.	N	Y	N	N	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. Monitoring St: A.III.5. & 7. Reporting St.: A.IV.4. & 6. ET: not applicable

P051	VOC: 31.08 lbs/batch & 11.34 tons/yr	N	Y	N	N	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. Monitoring St: A.III.2. through 4. Reporting St.: A.IV.2. & 3.
P051	VOC controlled at all times by an incinerator.	N	Y	N	N	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. Monitoring St: A.III.7. Reporting St.: A.IV.5. ET: not applicable
P051, P052 & P073	Incinerator shall reduce VOC by at least 98% by weight.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: average combustion temperature within the thermal incinerator shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation, unless the permittee demonstrates that 98% by weight can be achieved at a lower temperature.
P052	VOC: 130.8 lbs/day, 16.14 tons/yr from reactors and holding tanks, 4.29 tons/yr from feed tanks, 4.43 tons/yr from filters Include requirements of OAC rules 3745-21-09(LL) and 3745-31-05(D)	N	Y	N	N	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. Monitoring St: A.III.2. through 4. Reporting St.: A.IV. 2.

P052	SO2: 21.05 lbs/hr and 15.6 tons/yr SO2 : controlled by the scrubber prior to exhausting to the flare.	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: pH of the scrubber liquor shall be maintained at minimum of 7.5 while the scrubber is in use. Monitoring St: A.III.5., 6. 11. & 12. Reporting St.: A.IV.5., 6. & 9.
P052	VOC: 24.86 tons/rolling 12-month period	N	Y	N	Y	Y	Y	N	Y		Y	N	Y	N	3745-31-05(D); all of the requirements have been transferred from the permit to install. OR: maximum annual number of "solvent-containing" batches, excluding the methanol batches, shall not exceed 2,867, based upon a rolling, 12-month summation of the production rates. To ensure enforceability during the first 12 calendar months of operation, permittee shall not exceed: Month — Maximum Allowable Number of "solvent-containing" Batches 1 to 1-12 — 239 to 2867 After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual limitation of "solvent-containing" batches shall be based upon a rolling, 12-month summation of the number of batches. Monitoring St: A.III.2. through 4. Reporting St.: A.IV.3.
P052	VOC: controlled by either an incinerator or a flare unless otherwise exempted by OAC 3745-21-09(LL)(3).	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. ET: not applicable

P052 & P073	The flare designed/ operated according to OAC 3745-21-09(DD)(10)(d)	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: pilot flame shall be maintained at all times in the flare's pilot light burner. Monitoring St for P052: A.III.13. Reporting St. for P052: A.IV.12. & 13. Monitoring St. for P073: A.III.10. Reporting St. for P073: A.IV.7. & 8. ET: not applicable
P052 & P073	none	-18-06(E)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P055, P057, P058, P062 & P063	Not load more than 40,000 gal. of any volatile photochemically reactive material in loading rack unless vented to adsorption system.	-21-07(E)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: carbon adsorber system shall process and recover at least ninety per cent by weight of all vapors and gases from the equipment being controlled.
P055, P057, P058, P062 & P063	Displaced vapors/gases vented only to the adsorption system.	-21-07(E)		N	N	Y	N	N	Y	N	Y	N	Y	N	

P055 - P071	Prevent liquid drainage from loading arm when not in use or accomplish complete drainage before the loading arm is disconnected.	-21-07(E)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp: no requirements established in SIP. ET: not applicable
P059	VOC: 27.36 lbs/day & 5.0 tons/year	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: The maximum, ave. daily throughput of lubricant additives & anglamols, combined, shall not exceed 12,000 gallons. The max. loading loss for materials loaded in this emissions unit shall not exceed 2.28 lbs VOC/1000 gallons loaded.
P056, P060-P061, P064-P071	Not load more than 40,000 gallons of any volatile photochemically reactive material in loading rack during any one day.	-21-07(E)		N	N	Y	N	N	Y	N	Y	N	N	N	ET: not applicable
P073	VOC: 5.37 lbs/batch & 1.0 tons/year from all process vent streams controlled by the fume incinerator &/or flare; 26.8 lbs/batch from all process vent streams not controlled by the fume incinerator or flare.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.

P073	SO2: 10 lbs/day & 1.8 tons/year Potential SO2 emissions above deminimis shall be controlled by the scrubber prior to exhausting to flare.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install. OR: Permittee shall operate/maintain wet scrubber in accordance with the following: (a) not less than 7.5 pH when using caustic scrubber liquor; (b) not more than 6.5 pH when using Anthium dioxide; and (c) not less than two gallons per minute scrubber liquor flow rate.
P074	VOC: 3.5 lbs/batch & 1.0 tons/year from all process vent streams controlled by the incinerator; 17.5 lbs/batch from all process vent streams not controlled by the incinerator.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.
P074	NO2: 25 lbs/batch & 7.0 tons/year	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install.
P074	none	-23-06(B)		N	N	N	N	N	N	N	N	N	N	N	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).

T013 - T186	When storing liquid organic materials: no volatile photochemically reactive material. When storing petroleum liquids: no vapor pressures of greater than 1.52 psia.	-21-07(D) or -21-09(L)		Y	N	Y	Y	N	Y	Y	Y	N	N	N	ND: T122, T123, T136 & T186 are exempt from OAC rule 3745-21-09(L)(1) because each tank has a capacity of less than 40,000 gallons. Monitoring St. (T077 & T186): A.III.2. Reporting St. for T077: A.IV.3. & 4. Reporting St. for T186: A.IV.3. ET: not applicable
T077 & T186	VOC: 0.25 tons/yr	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	Y	Y	3745-31-05(A)(3); all of the requirements have been transferred from the permit to install Monitoring St. for T077: A.III.2. Monitoring St. for T186: A.III.2. & 3. Reporting St. (T077 & T186): A.IV.2. Testing St. (T077 & T186): A.V.2a.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

  Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

  1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
  2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
  3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
  4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

  An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.