



11/12/2013

Bill Rupert
BP-Husky Refining LLC
4001 Cedar Point Road
Oregon, OH 43616

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0448020007
Permit Number: P0112354
Permit Type: Administrative Modification
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
TDES; Michigan; Indiana; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
BP-Husky Refining LLC

Issue Date: 11/12/2013
Permit Number: P0112354
Permit Type: Administrative Modification
Permit Description: Administrative modification to correct originally miscalculated SO2 emission limit
Facility ID: 0448020007
Facility Location: BP-Husky Refining LLC
4001 Cedar Point Road, P.O. Box 696
Oregon, OH 43697
Facility Description: Petroleum Refineries

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Peter Park, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Toledo refinery of BP-Husky Refining LLC (BP-Husky) has submitted an application for administrative modification to PTI 04-919 which was issued on July 3, 1996 for the installation of T170 (PR 500294). This tank is a 420,000 gallon fixed-roof foul condensate tank equipped with a closed vent system that vents to a flare.

BP-Husky has identified an error in the PTI for calculating SO₂ emission limit. The calculation was based on the assumption that VOC stream from the tank contains 5% H₂S by volume and 100% H₂S converts to SO₂ in the flare. The calculation method in the permit erroneously indicates to divide by the molecular weight of H₂S (34) thus inappropriately lowering the SO₂ limit from 4.9 tons per year to 0.14 tons per year.

This modification is needed to correct the error in the calculation of SO₂ limit. Current calculation method states as follows: Divide the uncontrolled VOC emissions in tons per year from section A.V.1.a. by the molecular weight of VOC vapor (46.6 tons/ton-mole) and multiply by the hydrogen sulfide concentration of 5 mole percent. Multiply the previous products by the molecular weight of sulfur dioxide (64) and divide by the molecular weight of hydrogen sulfide (34).

This modification will replace the last part of the compliance determination language which states "divide by the molecular weight of hydrogen sulfide (34)" with "by the ratio of moles of sulfur dioxide to moles of hydrogen sulfide (1/1)". Corrected compliance determination language will read as follows: Divide the uncontrolled VOC emissions in tons per year from section f)(1)a. by the molecular weight of VOC vapor (46.6 tons/ton-mole) and multiply by the hydrogen sulfide concentration of 5 mole percent. Multiply the previous products by the molecular weight of sulfur dioxide (64) and by the ratio of moles of sulfur dioxide to moles of hydrogen sulfide (1/1).

The SO₂ emission limit will be revised from 0.14 tpy to 4.9 tpy.

3. Facility Emissions and Attainment Status:

This facility is a major source of CO, NO_x, PM_{2.5}, SO₂, VOC, HAP, and CO_{2e}. This facility is located in Lucas County, which is designated attainment for all criteria pollutants.

4. Source Emissions:

The corrected SO₂ emission limit from this tank will be 4.9 tons per year (tpy). It was calculated as follows:

71 tpy uncontrolled VOC emissions from tank/46.6 ton/ton mole VOC*0.05 moles H₂S/ 1mole VOC*64 ton/ton mole SO₂/1 mole SO₂/ 1 mole H₂S.



Since the corrected SO₂ emission limit will be increased 4.76 tpy from 0.14 tpy to 4.9 tpy, the installation permits that were issued in the five year period following issuance of this permit were reviewed to see if any SO₂ netting would have been affected. In the five year period following issuance of this PTI, 7 PTIs had been issued. Of those PTIs, only Toledo Repositioning Project (TRP) permit application (PTI 04-1046) conducted SO₂ netting. The net SO₂ emissions increase for the project was 20.7 tpy. Therefore, 4.76 tons per year SO₂ increase from this PTI would have kept SO₂ emission increase from the TRP project well below the 40 tons per year PSD significant net increase threshold and would have not affected the PSD applicability of the TRP project.

5. Conclusion:

As identified above, the SO₂ emissions increase is less than the PSD significance level, and SO₂ is not subject to PSD requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>1.4</u>
<u>SO₂</u>	<u>4.9</u>



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
BP-Husky Refining LLC**

Facility ID:	0448020007
Permit Number:	P0112354
Permit Type:	Administrative Modification
Issued:	11/12/2013
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
BP-Husky Refining LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. T170, FR, PR-500294	14



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448020007
Facility Description: Toledo Refinery
Application Number(s): A0038544
Permit Number: P0112354
Permit Description: Administrative modification to correct originally miscalculated SO2 emission limit
Permit Type: Administrative Modification
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/12/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

BP-Husky Refining LLC
4001 Cedar Point Road
P.O. Box 696
Oregon, OH 43697

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0112354

Permit Description: Administrative modification to correct originally miscalculated SO2 emission limit

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	T170
Company Equipment ID:	FR, PR-500294
Superseded Permit Number:	04-919
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. 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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) 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.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Toledo Department of Environmental Services 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60 Subpart A and K: T170. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the appropriate Ohio EPA district or local air agency.
3. The following emission unit contained in this permit is subject to 40 CFR Part 63 Subpart CC: T170. The complete NSPS and MACT requirements, including the MACT General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the appropriate Ohio EPA district or local air agency.



Draft Permit-to-Install
BP-Husky Refining LLC
Permit Number: P0112354
Facility ID: 0448020007
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. T170, FR, PR-500294

Operations, Property and/or Equipment Description:

T170 is a 10,065.33 barrel fixed roof storage vessel with a closed vent system controlled by either the West Acid Gas Flare (P001) or the SRU #1 Acid Gas Flare (P051). The tank is identified as tank number PR500294 and is classified as a Group 2 storage vessel pursuant to 40 CFR 63.641.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-05(A)(3) (PTI 04-919 as modified on July 3, 1996)	1.42 tons per year volatile organic compounds (VOC) 4.9 tons per year sulfur dioxide (SO ₂) See b)(2)a. and b)(2)d.
b.	OAC rule 3745-21-09(L)	See b)(2)b.
c.	40 CFR 60, Subpart A (40 CFR 60.1 – 60.19)	See b)(2)c.
d.	40 CFR 60, Subpart K (40 CFR 60.110-113) [In accordance with 40 CFR 60.110(c), this emissions unit is a petroleum liquid storage vessel with a storage capacity greater than 65,000 gallons and construction commenced after June 11, 1973, and prior to May 19, 1978 subject to the emissions limitations/control measures specified in this section]	See b)(2)f. [60.112(a)]
e.	40 CFR 63, Subpart CC (40 CFR 63.640 - 63.657) [In accordance with 40 CFR 63.640(a), 63.640(c)(2) and 63.641,	40 CFR 63, Subpart CC, establishes no emission limitation or control measures for Group 2 storage vessels. See b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	this emissions unit is subject to Subpart CC as a Group 2 storage vessel; it is associated with petroleum refining process units located at a plant site that is a major source as defined in section 112(a) of the Clean Air Act; and meets the definition of a Group 2 storage vessel as defined in 63.641.]	[63.640(m)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart K.
- b. The requirements of this rule are less stringent than the requirements established by OAC rule 3745-31-05(A)(3).
- c. 40 CFR Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- d. This emission unit shall be equipped with a closed vent system controlled by the West Acid Gas Flare (P001) or the SRU #1 Acid Gas Flare (P051) meeting the requirements of 40 CFR 60.18.
- e. If a change that does not meet the criteria in 63.640(l) is made to a petroleum refining process unit subject to 40 CFR Part 63 Subpart CC, and the change causes a Group 2 emission point to become a Group 1 emission point (as defined in 40 CFR Part 63.641), the permittee shall comply with the requirements of Subpart CC for existing emissions units for the Group 1 emission point as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1.
 - i. The permittee shall submit to the Director and Administrator for approval a compliance schedule, along with a justification for the schedule.
 - ii. The compliance schedule shall be submitted within 180 days after the change is made, unless the compliance schedule has been previously submitted to the permitting authority. If it is not possible to determine until after the change is implemented whether the emission point has become Group 1, the compliance schedule shall be submitted within 180 days of the date when the effect of the change is known to the source. The compliance schedule may be submitted in the next Periodic Report if the change is made after the date the Notification of Compliance Status report is due.



- iii. The Administrator shall approve or deny the compliance schedule or request changes within 120 calendar days of receipt of the compliance schedule and justification. Approval is automatic if not received from the Administrator within 120 calendar days of receipt.
 - f. The requirements of this rule are less stringent than the requirements established by OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of all periods of operation during which the West Acid Gas Flare pilot flame and/or the SRU #1 Acid Gas Flare pilot flame absent.
 - (2) The permittee shall maintain records showing:
 - a. The type of material stored within the storage vessel; and
 - b. The true vapor pressure of the stored material at maximum storage temperature.
 - (3) The permittee shall keep copies of all applicable reports and records required by this permit for at least 5 years. All applicable records shall be maintained in such a manner that they can be readily accessed within 24 hours. Records may be maintained in hard copy or computer readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
 - (4) See 40 CFR Part 60, Subpart K (40 CFR 60.110 – 60.113).
 - (5) See 40 CFR Part 63, Subpart CC (40 CFR 63.640 – 63.657).
- e) Reporting Requirements
- (1) The permittee shall submit a written semiannual deviation (excursion) report to the Toledo Division of Environmental Services of all periods recorded under section d)(1) in which the pilot flame was absent. This report shall be submitted by January 31 and July 31 of each year for the previous 6 calendar months.
 - (2) See 40 CFR Part 60, Subpart K (40 CFR 60.110 – 60.113).
 - (3) See 40 CFR Part 63, Subpart CC (40 CFR 63.640 – 63.657).
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission limitation

1.42 tons per year VOC

Applicable compliance Method:

If required, compliance shall be demonstrated using: the latest version of Tanks, computer software, or equivalent AP-42 methodology issued by U.S. EPA for calculating tank emissions; records required by section c) of the terms and conditions for unit; and an estimated flare control efficiency of 98 percent.

b. Emission Limitation:

4.9 tons per year SO₂

Applicable compliance Method:

Divide the uncontrolled VOC emissions in tons per year (71 tons/yr) by the molecular weight of VOC vapor (46.6 tons/ton-mole) and multiply by the hydrogen sulfide concentration of 5 mole percent. Multiply the previous product by the molecular weight of sulfur dioxide (64) and by the ratio of moles of sulfur dioxide to moles of hydrogen sulfide (1/1).

(2) See 40 CFR Part 60, Subpart K (40 CFR 60.110 – 60.113).

(3) See 40 CFR Part 63, Subpart CC (40 CFR 63.640 – 63.657).

g) Miscellaneous Requirements

(1) None.