



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Lucas County
Application No: 04-1044
NSPS
SYNTHETIC MINOR

CERTIFIED MAIL

January 29, 1997

BP OIL CO., TOLEDO REFINERY
RONALD H. YOUNGS
P.O. BOX 696
TOLEDO, OH 43697

RECEIVED
FEB 10 1997
City of Toledo
Environmental Services

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
TOLEDO ENVIRONMENTAL SERVICES DIVISION
MICHAEL WHITE, CITY OF OREGON

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 04-1044
APS Premise No. 0448020007
Permit Fee: \$1500.00

Name of Facility: BP OIL CO., TOLEDO REFINERY

Person to Contact: RONALD H. YOUNGS

Address: P.O. BOX 696
TOLEDO, OH 43697

Location of proposed source(s): 4001 CEDAR POINT ROAD
OREGON, OHIO

Description of proposed source(s):
ASPHALT LOAD RACK AND (2) 10,000 BBL FIXED ROOF TANKS.

Date of Issuance: January 29, 1997

Effective Date: January 29, 1997

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BP OIL CO., TOLEDO REFINERY located in Lucas County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
J005	Asphalt loading rack	Compliance with NSPS Subpart GGG	3745-31-05 3745-21-09 (T) NSPS Subpart GGG	0.123 lb VOC per 1000 gallons loaded; 3.2 tons/yr VOC
T174	PR-500062/ 10,000 BBL fixed roof petroleum liquid storage tank	Submerged fill	3745-31-05 3745-21-09 (L) NSPS Subpart Kb	17 tons/yr VOC
T175	PR-500063/ 10,000 BBL fixed roof petroleum liquid storage tank	Submerged fill	3745-31-05 3745-21-09 (L) NSPS Subpart Kb	17 tons/yr VOC

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	37.2

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
J005 T174, T175	Asphalt Load Rack 10,000 BBL Tanks	GGG Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

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

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-1049

and Toledo Pollution Control Division
26 Main Street
Toledo, Ohio 43605

RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.

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

AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s):</u>	<u>Tank Size:</u>
T174, T175	10,000 BBL

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall not place, store, or hold in fixed roof tank T174 any petroleum liquid which, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute.
2. The maximum annual throughput for the asphalt loading rack J005 shall not exceed 51,240,000 gallons, based upon a rolling, 12-month summation of the gallons of the asphalt loaded.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the throughput levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Throughput (gallons)</u>
1	25,620,000
1-2	38,430,000
1-3	51,240,000
1-4	51,240,000
1-5	51,240,000
1-6	51,240,000
1-7	51,240,000
1-8	51,240,000
1-9	51,240,000

<u>Month</u>	<u>Maximum Allowable Cumulative Throughput (gallons)</u>
1-10	51,240,000
1-11	51,240,000
1-12	51,240,000

After the first 12 calendar months of operation, compliance with the annual loading rate limitation shall be based upon a rolling, 12-month summation of the asphalt loaded.

B. Monitoring and Recordkeeping Requirements

1. The permittee shall maintain records of the following information for T174 and T175:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.
2. The permittee shall maintain monthly records of the following information for J005:
 - a. the loading rate for each month; and
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the production rates.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative loading rate for each calendar month.

3. The permittee shall comply with the requirements of 40 CFR 60.482-1 to 60.482-10 as soon as practicable, but no later than 180 days after initial startup.
4. The permittee may elect to comply with the requirements of 40 CFR 60.483-1 and 60.483-2.
5. The permittee may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in this subpart. In doing so, the owner or operator shall comply with requirements of 40 CFR 60.484.
6. The permittee shall comply with the provisions of 40 CFR 60.485 except as provided in 40 CFR 60.593.

7. The permittee shall comply with the provisions of 40 CFR 60.486 and 60.487.

C. Reporting Requirements

1. If the permittee places, stores, or holds in fixed roof tank T174 or T175 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 within 30 days of becoming aware of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month loading rate limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative loading levels for J005.

D. Compliance Method Requirements

1. Compliance with the emission limitations in the Air Emission Summary of this permit to install shall be determined in accordance with the following methods:

<u>Emission Limitation</u>	<u>Applicable Compliance Method</u>
J005, 3.2 tons/yr VOC	Multiply the VOC loading loss emission factor of 0.123 lb/1000 gallons of asphalt loaded by the actual annual asphalt loading rate
T174, 17 tons/yr VOC	Emission calculation using Tanks Program 3.0 computer software using the actual annual throughput
T175, 17 tons/yr VOC	Emission calculation using Tanks Program 3.0 computer software using the actual annual throughput