



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: 04-1111  
NESHAP  
SYNTHETIC MINOR

CERTIFIED MAIL

March 25, 1998

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

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 Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
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: TOLEDO METRO COUN OF GOVT  
MI DEPT OF NAT RES

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

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

RECEIVED

MAR 30 1998

City of Toledo  
Environmental Services



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## Permit to Install Terms and Conditions

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Application No. 04-1111  
APS Premise No. 0448020007  
Permit Fee: \$400.00

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):  
BELT FILTER PRESS.

Date of Issuance: March 25, 1998

Effective Date: March 25, 1998

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

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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)

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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 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 and regulations.

**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 &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P039	2.2 Meter Bio Press/Belt Press for dewatering biological sludge and for backup oily sludge	Operation according to good engineering practices	3745-31-05 40 CFR Part 63, subpart CC	Negligible emissions while processing biological sludge. 12 pounds/hour non-methane organic compounds, measured as methane, while operating in oily sludge service, and 26 tons/year VOC.

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	26 (There is no net emission increase with this installation).

**CONSTRUCTION STATUS**

The Toledo Pollution Control Division shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: P039 belt filter press.

**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

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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.

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 maximum combined annual operating hours of P013, P014 and P039 in oily sludge service is 4380 hours per year. There is no operational restriction on processing biological sludge with emission units P013, P014 and P039.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the operating hours specified in the following table while processing oily sludge:

<u>Month</u>	<u>Maximum</u> <u>Operating</u>	<u>Allowable</u> <u>Hours of Oily</u> <u>Processing</u>	<u>Cumulative</u> <u>Sludge</u>
1		744	
1-2		1488	
1-3		2232	
1-4		2976	
1-5		3720	
1-6		4380	
1-7		4380	
1-8		4380	
1-9		4380	
1-10		4380	
1-11		4380	
1-12		4380	

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 operating hours of P013, P014 and P039 while processing oily sludge.

2. The emissions unit listed in this Permit to Install shall comply with the Group 2 Process Vent MACT requirements of 40 CFR Part 63, subpart CC upon startup or August 18, 1998 whichever is later.

**B. Monitoring and Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the monthly and the rolling 12-month summation of operating hours of P013, P014 and P039 while processing oily sludge.

**C. Reporting Requirements**

1. The permittee shall submit an annual report summarizing the combined operating hours of P013, P014 and P039 while operating in oily sludge service. This report shall be submitted by January 30 of each year and shall summarize the previous calendar year.
2. The permittee shall submit semi-annual deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hour limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative operating hours for P013, P014 and P039. These reports shall be submitted by January 30 and June 30 of each year.

**D. Compliance Method Requirements**

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

a. Emission Limitation

12 pounds/hour VOC while processing oily sludge

Applicable Compliance Method

Multiply the emission factor of 2.87 pounds/ton from the July, 1997 BP test times the processing rate of oily sludge in tons per hour.