



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43266-0149  
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George V. Voinovich  
Governor

Donald R. Schregardus  
Director

Re: Permit to Install  
Lucas County  
Application No: 04-708  
NSPS  
NESHAP  
NETTING

CERTIFIED MAIL

RECEIVED

MAR 23 1992

City of Toledo  
Div. of Pollution Control

March 18, 1992

BP OIL COMPANY, TOLEDO REFINERY  
MICHAEL L. FINKLER  
P. O. BOX 696  
TOLEDO, OH 43694

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.

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 and the Environmental Law Division of the Office of the Attorney General 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  
CITY OF OREGON



# Permit to Install

## Terms and Conditions

Application No. 04-708  
APS Premise No. 0448020007  
Permit Fee: \$17120.00

Name of Facility: BP OIL COMPANY, TOLEDO REFINERY

Person to Contact: MICHAEL L. FINKLER

Address: P. O. BOX 696  
TOLEDO, OH 43694

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

Description of proposed source(s):  
2 DIESEL HYDROTREATING TRAINS, 2 FURNACES & 22 STORAGE TANKS  
OF VARIOUS SIZES.

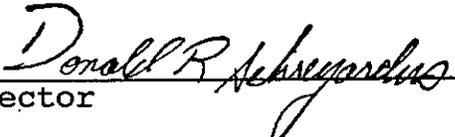
Date of Issuance: March 18, 1992

Effective Date: March 18, 1992

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 SOURCE(S)

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 Ohio 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.

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#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 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 and a \$15 application fee 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 made at least 90 days prior to start-up of the source.

#### AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BP OIL COMPANY, 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 and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
B029	DHT Train A, HDN Furnace - 30 MMBTU/hr	Use of Low-NO <sub>x</sub> Burners; Treatment of Fuel Gas With SRU	3745-31-05 NSPS Subpart J	0.002 lb PM/MMBTU 0.29 ton PM/yr 0.030 lb SO <sub>2</sub> /MMBTU 3.91 ton SO <sub>2</sub> /yr 0.004 lb VOC/MMBTU 0.56 ton VOC/yr 0.1 lb NO <sub>x</sub> /MMBTU 13.14 ton <sup>x</sup> NO <sub>x</sub> /yr 0.026 lb CO/MMBTU 3.37 ton CO/yr
B030	DHT Train B, Iso Furnace - 80 MMBTU/hr	Use of Low-NO <sub>x</sub> Burners; Treatment of Fuel Gas With SRU	3745-31-05 NSPS Subpart J	0.002 lb PM/MMBTU 0.81 ton PM/yr 0.032 lb SO <sub>2</sub> /MMBTU 11.07 ton SO <sub>2</sub> /yr 0.005 lb VOC/MMBTU 1.58 ton VOC/yr 0.1 lb NO <sub>x</sub> /MMBTU 35.04 ton <sup>x</sup> NO <sub>x</sub> /yr 0.027 lb CO/MMBTU 9.57 ton CO/yr
P028	DHT Train A (10,000 BPSD)	Leak Detection and Repair Program	3745-31-05 NSPS Subpart GGG	1.83 ton VOC/yr
P029	DHT Train B (30,000 BPSD)	Leak Detection and Repair Program	3745-31-05 NSPS Subpart GGG	32.30 ton VOC/yr
P030	Sour Water Stripper System	Handle All Sour Water in a Closed System; All Hydrogen Sulfide Will Be Sent to SRU (P009)	3745-31-05 NESHAPS Subpart FF	Not Applicable
T143	9,600 Gal DEA Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	<0.01 ton VOC/yr

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
T144	4,515 Gal DEA Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	<0.01 ton VOC/yr
T145	37,044 Gal Flow Improver Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	0.73 ton VOC/yr
T146	2,205 Gal Flow Improver Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	0.12 ton VOC/yr
T147	2,205 Gal Flow Improver Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	0.12 ton VOC/yr
T148	2,205 Gal Anti-Static Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	0.01 ton VOC/yr
T149	21,168 Gal Cetane Improver Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	0.02 ton VOC/yr
T150	1,617 Gal Cetane Improver Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	0.02 ton VOC/yr

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
T151	21,168 Gal Methanol Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	0.63 ton VOC/yr
T152	2,205 Gal Methanol Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ	0.14 ton VOC/yr
T153	3,732,540 Gal No. 2 Fuel Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.21 ton VOC/yr
T154	3,732,540 Gal No. 2 Fuel Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.21 ton VOC/yr
T155	3,732,540 Gal No. 2 Fuel Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.21 ton VOC/yr
T156	3,732,540 Gal No. 2 Fuel Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.21 ton VOC/yr
T157	3,234.000 Gal Water White Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.57 ton VOC/yr

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
T158	3,234,000 Gal Water White Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.57 ton VOC/yr
T159	3,234,000 Gal FCC Light Cycle Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	1.22 ton VOC/yr
T160	3,234,000 Gal FCC Light Cycle Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	1.22 ton VOC/yr
T161	3,234,000 Gal Light Gas Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.57 ton VOC/yr
T162	3,234,000 Gal Light Gas Oil Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub>	4.57 ton VOC/yr
T163	4,620,000 Gal FCC Feed/Sour Water Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals; Duel Seals on the External Floating Roof	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub> NESHAPS Subpart FF	0.75 ton VOC/yr
T164	420,000 Gal Sour Water Tank	Use of Submerged Fill; Equip Draw-offs With Water Seals; Vent to a Flare	3745-31-05 NSPS Subpart QQQ, K <sub>b</sub> NESHAPS Subpart FF	0.90 ton VOC/yr

SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Compounds	77.27
Sulfur Dioxide	14.98
Particulate Matter	1.10
Carbon Monoxide	52.94
Nitrogen Oxides	48.14

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>
B029	HDN Furnace	J
B030	Iso Furnace	J
P028	DHT Train A	GGG
P029	DHT Train B	GGG
T143, T144, T146- T148, T150, T152	Fixed Roof Storage Tank	QQQ
T145, T149, T151, T153-T162, T164	Fixed Roof Storage Tank	QQQ, Kb
T163	External Floating Roof	QQQ, 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:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
Permit Management Unit  
P.O. Box 1049  
Columbus, OH 43266-0149

and

Toledo Environmental Services Division  
26 Main Street  
Toledo, OH 43605

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source No.</u>	<u>Source Description</u>	<u>NESHAP Regulation</u>
P030	Sour Water Stripper	FF
T163	EFR Tank	FF
T164	Fixed Roof Tank	FF

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

1. Date of commencement of construction (no later than 30 days after such date);
2. Anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
3. Actual date of initial start-up (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
Division of Air Pollution Control  
Permit Management Unit  
P.O. Box 1049  
Columbus, OH 43266-0149

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and

Toledo Environmental Services Division  
26 Main Street  
Toledo, OH 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 two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized 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.

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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 test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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> (Gallons)
T145	37,044
T149	21,168
T151	21,168
T153	3,732,540
T154	3,732,540
T155	3,732,540
T156	3,732,540
T157	3,234,000
T158	3,234,000
T159	3,234,000
T160	3,234,000
T161	3,234,000
T162	3,234,000
T163	4,620,000
T164	420,000

In addition,

- A. In accordance with 40 CFR 60.116b(a) and (c), the owner and operator of the following storage vessel(s) shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

<u>source number(s):</u>	<u>tank size:</u>
T151	21,168 Gallons

- B. In accordance with 40 CFR 60.116b(a) and (d), the owner and operator of the following storage vessel(s) shall notify the local field office within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Records shall be retained for a minimum of two years.

source number(s):

tank size:

T145  
T149  
T151

37,044 Gallons  
21,168 Gallons  
21.168 Gallons

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**CONTROL REQUIREMENTS**

**FIXED ROOF STORAGE TANK T164**

1. In accordance with 40 CFR 61.343 (NESHAPS Subpart FF), tank T164 shall be vented to a closed-vent system and control device. The covers and all openings on the fixed roof storage tank shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmw above background.
2. Each opening shall be maintained in a closed and sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.
3. The flare controlling Tank T164 shall comply with 40 CFR 60.18 (NSPS Subpart A).

**EXTERNAL FLOATING ROOF STORAGE TANK T163  
(NESHAPS Subpart FF and NSPS Subpart k<sub>1</sub>)**

1. In accordance with 40 CFR 61.35(a)(2), BP Oil Company shall comply with 40 CFR 60.112b(a)(2) by equipping the external floating roof storage tank T163 with an the external floating roof that has two seals, one above the other, between the wall of the storage vessel and the roof edge, with the primary seal (lower seal) being a mechanical shoe seal. The secondary seal shall be a flexible wiper that can completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion. Each opening on the external floating roof shall provide a projection below the liquid surface (except for automatic bleeder and rim space vents) and must be equipped with a gasketed cover, seal or lid (except for automatic bleeder and rim space vents, roof drains, and leg sleeves) which are maintained in a closed position (except during actual use). The roof shall be floating on the liquid at all times except during initial fill and when emptied and refilled.

**HDN FURNACE B029 AND ISO FURNACE B030  
(NSPS Subpart J)**

1. In accordance with 40 CFR 60.104(a)(1), the refinery will maintain the H<sub>2</sub>S concentration in the fuel gas burned in B029 and B030 below 0.10 gr/dscf.

## MONITORING REQUIREMENTS

### **PUMPS IN LIGHT LIQUID SERVICE (NSPS Subpart GGG)**

1. In accordance with 40 CFR 60.482-2, each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified on 40 CFR 60.485(b), except as provided in 40 CFR 60.482-1(c) and 40 CFR 60.482-2(d), (e) and (f).
2. Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
3. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
4. If there are indications of liquids dripping from the seal, a leak is detected.
5. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected in 40 CFR 60.482-9.
6. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

### **VALVES IN GAS/VAPOR SERVICE IN LIGHT LIQUID SERVICE (NSPS Subpart GGG)**

1. In accordance with 40 CFR 60.483-1, BP Oil Company shall maintain a percentage of valves leaking of equal to or less than 2.0 percent.
2. All valves in gas/vapor and light liquid service shall be monitored within 1 week of the start up date and monthly to detect leaks by the methods specified on 40 CFR 60.485(b). Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
3. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
4. If a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9.
5. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

6. First attempts at repair include, but are not limited to, the following best practices where practicable:
  - a. Tightening of bonnet bolts;
  - b. Replacement of bonnet bolts;
  - c. Tightening of packing gland nuts;
  - d. Injection of lubricant into lubricating plated packing.
7. The leak percentage shall be determined by dividing the number of valves for which leaks are detected by the number of valves in gas/vapor and light liquid service.

**PUMPS AND VALVES IN HEAVY LIQUID SERVICE,  
PRESSURE RELIEF DEVICES IN LIGHT LIQUID OR HEAVY LIQUID SERVICE,  
AND FLANGES AND OTHER CONNECTORS  
(NSPS Subpart GGG)**

1. In accordance with 40 CFR 60.482-8, pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days by the method specified in paragraph 60.485(b) if evidence of a potential leak is found by visual audible, olfactory, or any other detection method.
2. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
3. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9.
4. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
5. First attempts at repair include, but are not limited to, the best practices described under 40 CFR 60.482-7(e).

**FIXED ROOF STORAGE TANK T164  
(NESHAPS Subpart FF)**

1. The covers and all openings (e.g., access hatches, sampling ports, and gauge wells) on the fixed roof storage tank T164 shall be monitored initially and thereafter at least once per year in accordance with 40 CFR 61.355(h) to verify the openings are operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmw above background.
2. Each cover, seal, access door, and all other openings shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur between the cover and tank wall and that access doors and other openings are closed and gasketed properly.

**EXTERNAL FLOATING ROOF STORAGE TANK T163  
(NSPS Subpart K<sub>6</sub>)**

1. Measurement of the gaps between the tank wall and the primary seal shall be performed within 60 days of the initial fill with VOL and at least once every five years thereafter.
2. Measurement of the gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.
3. Gap widths and areas shall be determined in accordance with 40 CFR 60.113b(b)(2).
4. The accumulated area of gaps between the tank wall and the mechanical shoe primary seal shall not exceed 212 cm<sup>2</sup> per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm.
5. The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter and the width of any portion of any gap shall not exceed 1.27 cm.
6. There are to be no holes, tears, or other openings in the seals or seal fabric.

**WASTEWATER SYSTEM  
(NSPS Subpart QQQ)**

1. Each tank drain shall be equipped with water seal controls
2. Each drain in active service shall be checked by visual or physical inspection initially and monthly thereafter for indications of low water levels or other conditions that would reduce the effectiveness of the water seal controls.
3. Whenever low water levels or missing or improperly installed caps or plugs are identified, water shall be added or first efforts at repair shall be made as soon as practicable, but not later than 24 hours after detection.

**HDN FURNACE B029 AND ISO FURNACE B030  
(NSPS Subpart J)**

1. In accordance with 40 CFR 60.105(a)(4), continuous emission monitoring systems shall be installed, calibrated, maintained and operated by BP Oil Company, Toledo Refinery for continuously monitoring and recording concentrations of hydrogen sulfide in fuel gases burned in B029 and B030. The span of this continuous monitoring system shall be 300 ppm. In addition to demonstrating compliance with the requirements specified in 40 CFR Part 60.13, any continuous emission monitoring system shall be designed so that a performance audit of the system's operation can be conducted pursuant to the procedures of the Ohio Environmental Protection Agency.

**STORAGE TANK THROUGHPUT REQUIREMENTS**

1. The storage tanks listed below shall not exceed their respective throughput limitations.

SOURCE NO.	ANNUAL THROUGHPUT LIMITATION (GALLONS)
T145	2,200,000
T146	1,100,000
T147	1,100,000
T148	11,000
T151	500,000
T152	500,000

2. BP Oil Company shall keep records of annual throughput for each storage tank listed above.

**REPORTING REQUIREMENTS**

1. BP Oil Company shall submit written semiannual reports in accordance with 40 CFR 60.487 (leak monitoring) to the Toledo Environmental Services Division. Monitoring reports for the months of January through June shall be submitted by August 1 of each year. Monitoring reports for the months of July through December shall be submitted by February 1 of each year.
2. BP Oil Company shall notify the Administrator 30 days in advance of any gap measurements on external floating roof tank T163 to afford the Administrator the opportunity to have an observer present.

ADDITIONAL TERMS AND CONDITIONS

1. BP Oil has removed from operation and shall not operate the boilers identified as B002, B012, and B026.
2. BP Oil shall enclose the oily ditch from the water pump station to the oil water separator, before the startup of the DHT. This enclosure shall be maintained in such a manner as to be closed to the atmosphere and shall be covered or enclosed in such a manner as to have no visual cracks, gaps, and other problems that could result in VOC emissions, except for 4 inch vent pipes at the junction boxes. This oily ditch sewer line shall be sealed at all times except for periods of emergency, malfunction, short term maintenance, and minor modifications, including taps and tie-ins.

In the event of an emergency or malfunction that requires or results in the oily ditch sewer line not being sealed, BP Oil shall notify the Toledo Division of Pollution Control (TDPC) in accordance with OAC rule 3745-15-06(B).

In the event of short term maintenance or minor modifications to the enclosed oily ditch sewer line that requires the sewer not being sealed, BP Oil shall notify the TDPC in accordance with OAC rule 3745-15-06(A).

3. BP Oil has used an emission reduction credit of 53 tons per year (TPY) of VOC for the enclosure of the oily ditch, to be applied toward netting out of non-attainment new source review. BP Oil may request additional emission reduction credits for this enclosure, provided that BP Oil supplies emission reduction calculations in accordance with applicable USEPA guidance documents.