



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: 04-804
NSPS
CEM

CERTIFIED MAIL

May 26, 1993

BP OIL COMPANY, TOLEDO REFINERY
MICHAEL L. FINKLER
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.

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 P DANSACK, CITY OF OREGON



Permit to Install Terms and Conditions

Application No. 04-804
APS Premise No. 0448020007
Permit Fee: \$1000.00

Name of Facility: BP OIL COMPANY, TOLEDO REFINERY

Person to Contact: MICHAEL L. FINKLER

Address: P O BOX 696
TOLEDO, OH 43697

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

Description of proposed source(s):
2 ASPHALT OXIDIZER TANKS & THERMAL OXIDIZER.

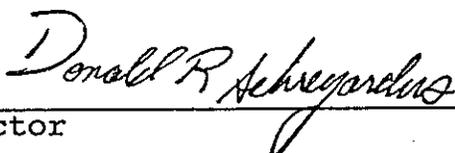
Date of Issuance: May 26, 1993

Effective Date: May 26, 1993

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 & Usage Requirements</u>
P033	Asphalt Plant, 2 Asphalt Oxidizing Tanks, Knockout Drum and Thermal Oxidizer	Use of a Thermal Oxidizer to Control VOC and PM Emissions	3745-31-05 3745-17-11 3745-18-54 (W) 3745-21-07 (G)(1) NSPS Subpart J; NSPS Subpart UU; NSPS Subpart GGG	0.0893 lb PM/ton Asphalt Charged; 10.8 lbs PM/hr; 1.3 tons PM/mo; 4.0 tons PM/yr; 0% Opacity; 3.8 lbs SO ₂ /hr; 0.72 ton SO ₂ /mo; 2.2 tons SO ₂ /yr 8.2 lbs NO _x /hr; 2.2 tons NO _x /mo 6.7 tons NO _x /yr 0.0023 lb VOC/ton Asphalt Charged*; 0.39 lb VOC/hr*; 0.10 ton VOC/mo*; 0.21 ton VOC/yr*; 99% Destruction of VOC's*; 7.82 lbs CO/hr; 2.6 tons CO/mo; 7.8 tons CO/yr; Operation of Thermal Oxidizer at a Minimum Temperature of 1450° F and a Residence Time of 1 Second

* Excluding Methane

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
CO	7.8
NO _x	6.7
VOC	0.55, excluding methane
PM	4.0
SO ₂	2.2

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>
P033	Asphalt Plant	J, UU, GGG

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 Pollution Control
26 Main Street
Toledo, OH 43605

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine

testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
3. Tests shall be performed for the following sources and pollutants:

<u>Source</u>	<u>Pollutant(s)</u>
P033	PM and VOC

4. Tests shall include a determination of the uncontrolled mass rate of VOC emissions.

MONITORING REQUIREMENTS

A H₂S monitor shall be installed on the Source P033. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 7. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.107, this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of values in excess of the limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1 and November 1 of each year and shall

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cover the data obtained during the previous calendar quarters.

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.

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.

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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.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with written certification (see enclosed form) that the facility has 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

Control Requirements

1. The maximum allowable throughput to P033 is 960 tons/day and 87,600 tons/yr of vacuum residuum. P033 shall not be operated for more than 2190 hours per year.
2. In accordance with 40 CFR 60.104, the refinery will maintain the H₂S concentrations in the fuel gas burned below 0.10 gr/dscf.
3. Emissions from the asphalt oxidizers shall pass through a knockout drum followed by a thermal oxidizer and remain in the thermal oxidizer chamber for a minimum of one (1) second at 1450^oF before exiting the chamber.
4. The thermal oxidizer shall have a minimum organic compound destruction efficiency of 99%, excluding methane, at worst case conditions.

Monitoring

1. In accordance with 40 CFR 60.105(a)(4), a continuous monitoring system shall be installed, calibrated, maintained and operated by the owner/operator of this source for continuously monitoring and recording concentrations of H₂S in fuel gases burned in P033. In addition to demonstrating compliance with the requirements specified in 40 CFR 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.
2. The thermal oxidizer shall be equipped with a device to continuously measure, display and record temperatures. The asphalt oxidizers shall not be operated, unless the thermal oxidizer is at a minimum temperature of 1450^oF.

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 the 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).

Recordkeeping and Reporting

1. BP Oil Company shall submit semi-annual reports in accordance with 40 CFR 60.487 (leak monitoring) to the Toledo Division of Pollution Control. Monitoring reports for the months of January through June shall be submitted by August 1 of each year. Reports for the months of July through December shall be submitted by February of each year.
2. BP Oil Company shall maintain the total rolling, 365 day amount of vacuum residuum charged to the asphalt oxidizing tanks in units of tons/yr. Records of the total rolling, 365 day hours of operation per year of P033 shall also be maintained.