



4/10/2014

Certified Mail

Paul Logsdon
Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0302020012
Permit Number: P0116163
Permit Type: Administrative Modification
County: Allen

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	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, The Lima News. 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 Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,


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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-NWDO; Indiana

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Lima Refining Company

Issue Date: 4/10/2014
Permit Number: P0116163
Permit Type: Administrative Modification
Permit Description: Administrative modification to revise the NOx emissions limitation for purpose of meeting system-wide NOx performance for boilers and process heaters to 0.044 lb/million Btu and add language for 40 CFR, Part 63, Subpart DDDDD.
Facility ID: 0302020012
Facility Location: Lima Refining Company
1150 South Metcalf Street,
Lima, OH 45804
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: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Permit Strategy Write-Up
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Lima Refining Company (LRC) is required to achieve a system wide average of 0.044 lbNO_x/MMBtu for facility heaters and boilers, as required by Paragraphs 21 and 292 of the consent decree with U.S. EPA, civil action No. SA07CA0683RF, dated 11/20/07. The facility had previously established interim NO_x limitations in PTI #P0112538 as a step to achieving the system wide average. The purpose of this administrative modification is to revise and establish final federally enforceable NO_x emission limitations for selected facility heaters and boilers (B002) in order to achieve the final system wide average of 0.044 lbNO_x/MMBtu. All other existing emissions limitations in the previously issued PTI #P0112538 for this emissions units will remain the same.

3. Facility Emissions and Attainment Status:

LRC is a major stationary source for SO₂, NO_x, CO, PE/PM₁₀ and VOC. Allen County is in attainment or attainment/unclassified status for all of the above pollutants, including compliance with the current ozone NAAQS.

4. Source Emissions:

There is no net increase in NO_x emissions for any of the emissions units included in this permit as a result of the establishment of the final NO_x limitations to achieve the system wide average of 0.044 lbNO_x/MMBtu. In addition, there are no emissions increases for any other pollutants as a result of this permitting action.

5. Conclusion:

The proposed modification does not result in any increase in allowable emissions of any pollutant and does not involve a "net emissions" increase triggering a major modification under PSD regulations, and as such the permit action can be processed as an administrative action.

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>
VOC	4.71
NOx	6.71
PE	14.92
SO ₂	745.91



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Lima Refining Company**

Facility ID:	0302020012
Permit Number:	P0116163
Permit Type:	Administrative Modification
Issued:	4/10/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Lima Refining Company

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Draft Permit-to-Install
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0302020012
Facility Description: Petroleum Refinery and Storage
Application Number(s): M0002506
Permit Number: P0116163
Permit Description: Administrative modification to revise the NOx emissions limitation for purpose of meeting system-wide NOx performance for boilers and process heaters to 0.044 lb/million Btu and add language for 40 CFR, Part 63, Subpart DDDDD.
Permit Type: Administrative Modification
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/10/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

Craig W. Butler
Director



Draft Permit-to-Install
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0116163
Permit Description: Administrative modification to revise the NOx emissions limitation for purpose of meeting system-wide NOx performance for boilers and process heaters to 0.044 lb/million Btu and add language for 40 CFR, Part 63, Subpart DDDDD.

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

Emissions Unit ID:	B002
Company Equipment ID:	Process Heaters
Superseded Permit Number:	P0112538
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012
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 Ohio EPA DAPC, Northwest District Office.



- (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 Ohio EPA DAPC, Northwest District Office. 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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



Draft Permit-to-Install
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012

Effective Date: To be entered upon final issuance

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.

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Lima Refining Company
Permit Number: P0116163
Facility ID: 0302020012

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.



Draft Permit-to-Install
Lima Refining Company
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C. Emissions Unit Terms and Conditions



1. B002, Process Heater

Operations, Property and/or Equipment Description:

Refinery Fuel Gas or Natural Gas Fired ISO Stabilizer/Splitter Heaters, 170.3 million Btu/hr maximum heat input (PR 170003/PR 175155) with selective catalytic reduction

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 3745-17-10(B)(1)	0.020 lb of particulate emissions (PE) per million Btu of actual heat input
b.	OAC rule 3745-18-08(C)(2)	1.0 lb of sulfur dioxide (SO ₂) per million Btu of actual heat input [See b)(2)g.]
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<u>Emissions from fugitive equipment leaks:</u> 0.3925 ton of volatile organic compounds (VOC)/month, averaged over a rolling, 12-month period [See b)(2)b.]
e.	OAC rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)c.
f.	40 CFR, Part 63, Subpart DDDDD (40 CFR 63.7480-7575) [In accordance with 63.7575, this emissions unit is in the 'unit designed to fire Gas 1 fuels' subcategory existing process heater located at a major source of HAP emissions and subject to the applicable emissions limitations/control requirements specified in this section.]	See b)(2)d., c)(2) through c)(5) 63.7500(a) Table 3 requirements



g.	40 CFR 63.1 through 63.15	Table 10 to 40 CFR, Part 63, Subpart DDDDD – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply.
h.	40 CFR, Part 60, Subpart J	See b)(2)e. and b)(2)f.
i.	40 CFR, Part 60, Subpart A	See 40 CFR 60.1 through 60.19
j.	OAC rule 3745-31-05(D)	0.009 lb nitrogen oxides (NOx)/million Btu of actual heat input based upon a rolling, 365-day block average See b)(2)h.

(2) Additional Terms and Conditions

- a. The ISO Stabilizer/Splitter Heaters are not being modified with this project. The only change to equipment involves modifying the ISO Recycle Splitter Tower kerosene rundown line to increase production throughput of the kerosene stream by 20,000 barrels per day, and simultaneously reducing naphtha production. New trays will be installed on the ISO Splitter Kerosene Stripper Tower (part of the isocracker process unit), along with a new air cooler and spare pumps.
- b. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/controls measures no longer apply.
- c. OAC rule 3745-31-05(A)(3)(a)(ii) applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the emissions of VOC from this air contaminant source since the uncontrolled potential to emit for VOC are less than 10 tons per year.
- d. This emissions unit is subject to the initial notification requirements of 40 CFR, Part 63, Subpart DDDDD (Boiler MACT) as outlined in 63.9(b) (i.e., it is not subject to the emission limits, performance testing, monitoring, or site-specific monitoring plan requirements of Subpart DDDDD or any other requirements in 40 CFR, Part 63, Subpart A).



e. 40 CFR, Part 60 - Subpart J is an applicable rule for this emissions unit. The permittee was required to comply with this New Source Performance Standard for fuel combustion by 1/18/08, per paragraph No. 115 of the federal consent decree addendum, civil action No. SA07CA0683RF, which became effective on 11/20/07.

f. In accordance with Federal Consent Decree No. SA07CA0683RF, dated 11/20/07, the permittee shall not burn any refinery fuel gas in this emissions unit that contains hydrogen sulfide (H₂S) in excess of 230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume).

This H₂S standard in 40 CFR 60.104(a)(1) is also applicable if the permittee combines and combusts natural gas in any proportion with refinery fuel gas in this emissions unit, according to the fuel gas definition in 40 CFR 60.101(d).

g. The SO₂ emissions limitation established in OAC rule 3745-18-08(C)(2) is less stringent than the hydrogen sulfide (H₂S) concentration limit of 230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume) established by Subpart J, 40 CFR 60.104(a)(1). Therefore, compliance with the SO₂ limit is ensured by compliance with the H₂S limit.

h. The NO_x emissions limitation is established pursuant to requirements in the federal consent decree addendum, civil action No. SA07CA0683RF, which became effective on 11/20/07. Pursuant to paragraph No. 17 of the consent decree addendum, this emissions unit is one of four emissions units (B002, B003, B006 and B008) chosen by the company for installation of NO_x control equipment. Selective catalytic reduction was installed on December 17, 2011 to meet this requirement.

As required by the consent decree addendum, the NO_x emissions limitation is established to reflect the final voluntary limits to meet a system-wide average NO_x performance level of 0.044 lb per million Btu.

This permit establishes the following federally enforceable emissions limitation for the purpose of representing the potential to emit of this emissions unit:

i. 0.009 lbNO_x/million Btu of actual heat input based upon a rolling, 365-day block average.

c) Operational Restrictions

(1) The permittee shall burn only refinery fuel gas or natural gas in this emissions unit. The sulfur content of the refinery fuel gas or natural gas burned in this emissions unit shall comply with the allowable SO₂ emission limitation specified in section b)(1).

(2) A process heater or boiler in the Gas 1 subcategory with heat input capacity of 10 million Btu per hour or greater shall conduct an annual tune-up of the boiler or process heater as specified in 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(vi). This tune-up frequency does not apply to limited-use boilers and process heaters, as defined in



63.7575, or units with continuous oxygen trim systems that maintain an optimum air to fuel ratio.

- (3) A process heater or boiler in the Gas 1 subcategory that has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or meets the definition of limited-use boiler or process heater in 40 CFR 63.7575, shall conduct a tune-up of the boiler or process heater every 5 years as specified in 40 CFR 63.7540(a)(10)(i) through (vi) to demonstrate continuous compliance. You may delay the burner inspection specified in 40 CFR 63.7540(a)(10)(i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.
 - (4) Pursuant to 40 CFR 63.7540(a)(13), if the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
 - (5) The permittee shall have a one-time energy assessment performed by a qualified energy assessor, pursuant to work practice standards 4.a through 4.h in Table 3 of 40 CFR, Part 63, Subpart DDDDD. The subsequent report associated with this assessment shall be submitted no later than January 31, 2016.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee burns a fuel other than refinery fuel gas or natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) In order to demonstrate compliance with the emission limitation of 230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume) of H₂S in the refinery fuel gas (and if applicable, combined fuel firing as noted in b)(2)c. above), the permittee shall operate and maintain an instrument for continuously monitoring and recording the concentration (dry basis) of H₂S in the refinery fuel gas or combined fuel stream before being burned in this emissions unit. The monitoring shall be conducted in accordance with 40 CFR 60.105(a)(4), as follows:
 - a. The span value for this instrument is 425 mg/dscm of H₂S.
 - b. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H₂S in the fuel gas being burned.
 - c. The performance evaluations for this H₂S monitor under 40 CFR 60.13(c) shall use Performance Specification 7 of 40 CFR, Part 60, Appendix B. The permittee shall conduct a relative accuracy test audit (RATA) for the H₂S continuous emission monitoring equipment at a minimum frequency of once every three years. Method 15 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods shall be used for conducting the RATAs.
 - (3) A statement of certification of the existing H₂S continuous emission monitoring system (CEMS) shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the



Agency that the system is considered certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 7.

Proof of certification shall be made available to representatives of the Ohio EPA, Northwest District Office upon request.

- (4) The permittee shall operate and maintain existing equipment to continuously monitor and record H₂S from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

The permittee shall maintain records of all data obtained by the H₂S CEMS including, but not limited to, parts per million of H₂S for each cycle time of the analyzer, with no resolution less than one data point per minute required, emissions of H₂S in units of the applicable standard (grain/dscf and parts per million by volume) as a rolling, 3-hour average, the results of daily zero/span calibration checks, and the magnitudes of manual calibration adjustments.

- (5) The permittee shall maintain a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of H₂S. The plan shall follow the requirements of 40 CFR, Part 60, Appendix F.

A logbook dedicated to the monitoring systems must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60, except as noted below.

Pursuant to paragraph No. 121 of the federal consent decree addendum, civil action No. SA07CA0683RF, dated 11/20/07, the permittee is required to:

- a. Conduct a relative accuracy test audit of the H₂S CEM at a minimum frequency of once every three years; and
 - b. Conduct cylinder gas audits on the H₂S CEM during each quarter when a relative accuracy test audit is not conducted.
- (6) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit, in units of parts per million by volume, on a dry basis. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of data obtained by the continuous NO_x monitoring system including, but not limited to:

- a. emissions of NO_x in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;



- b. emissions of NO_x in all units of the applicable standard(s) in the appropriate averaging period;
 - c. results of quarterly cylinder gas audits;
 - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
 - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
 - f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;
 - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;
 - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,
 - i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(6)g. and d)(6)h.
- (7) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 2. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

- (8) The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR, Part 60, Appendix F.

The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60, except as noted below.

Pursuant to paragraph No. 30 of the federal consent decree addendum, civil action No. SA07CA0683RF, dated 11/20/07, the permittee is required to:



- a. Conduct a relative test audit of the NO_x CEM at a minimum frequency of once every three years; and
 - b. Conduct cylinder gas audits on the NO_x CEM during each quarter when a relative accuracy test audit is not conducted.
- (9) The permittee shall install, operate and maintain equipment to continuously monitor and record oxygen (O₂) emitted from this emissions unit, in units of percent O₂. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.

The permittee shall maintain records of data obtained by the continuous O₂ monitoring system including, but not limited to:

- a. percent O₂ for each cycle time of the analyzer, with no resolution less than one data point per minute required;
 - b. results of quarterly cylinder gas audits;
 - c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
 - d. results of required relative accuracy test audit(s);
 - e. hours of operation of the emissions unit, continuous O₂ monitoring system;
 - f. the date, time, and hours of operation of the emissions unit without the continuous O₂ monitoring system;
 - g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous O₂ monitoring system; as well as,
 - h. the reason (if known) and the corrective actions taken (if any) for each such event in d)(9)f. and d)(9)g.
- (10) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous O₂ monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 3. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

- (11) The permittee shall maintain a written quality assurance/quality control plan for the continuous O₂ monitoring system designed to ensure continuous valid and representative readings of O₂ emissions in units of the applicable standard(s).



The plan shall follow the requirements of 40 CFR, Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous O₂ monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60, except as noted below.

Pursuant to paragraph No. 30 of the federal consent decree addendum, civil action No. SA07CA0683RF, dated 11/20/07, the permittee is required to:

- a. Conduct a relative accuracy test audit of the O₂ CEM at a minimum frequency of once every three years; and
 - b. Conduct cylinder gas audits on the O₂ CEM during each quarter when a relative accuracy test audit is not conducted.
- (12) Pursuant to the approval letter from U.S. EPA dated July 28, 2010, the permittee shall install and operate monitoring equipment in the selective catalytic reduction bypass stack to continuously monitor the temperature and draft pressure in the selective catalytic reduction bypass stack, subject to the following condition:
- a. The permittee must measure, report and comply with the temperature and pressure readings obtained in the bypass stack during normal operation as measured when stack testing the main stack to demonstrate initial compliance with applicable limits (i.e. – ambient temperature and a slight negative pressure in the bypass stack when the selective catalytic reduction induced draft fan is operating). The temperature and pressure readings are hereby incorporated into this permit as a means to assure compliance.
- (13) The permittee shall include the ISO Recycle Splitter Tower process fugitive emissions and associated components in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall be conducted in accordance with the alternative monitoring plan submitted by the permittee. Applicable requirements are listed in section B.2 of the Facility-wide Terms and Conditions of the Title V permit.
- (14) The permittee shall maintain monthly records of the fugitive VOC emissions from this emissions unit; and at the end of 12 months of operation, the rolling 12-month summation of fugitive VOC emissions and the average calculated over each rolling 12-month period.

Note: The above records shall be determined in accordance with the emissions calculations presented to the Ohio EPA in the permit application submitted by the permittee.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than refinery fuel gas or natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any H₂S CEMS downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions.

The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included the quarterly report.

- (3) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) on a quarterly basis, in writing, of all rolling, 3-hour periods during which the average concentration of H₂S as measured by the H₂S CEMS under 40 CFR 60.105(a)(4) exceeds 230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume). The rolling, 3-hour average shall be determined as the arithmetic average of three contiguous 1-hour averages.

The notification shall include a copy of the record and shall be sent to the Director (the Ohio EPA, Northwest District Office) by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during previous calendar quarters.

- (4) If there are no concentrations of H₂S in the refinery fuel gas (or combined fuel stream, if applicable) greater than 230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume) during the calendar quarter, then the permittee shall submit a statement to that effect along with the emissions unit and monitor operating times. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during previous calendar quarters.
- (5) The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any NO_x CEMS downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions.

The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included the quarterly report.

- (6) The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any O₂ CEMS downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit



operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions.

The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included the quarterly report.

- (7) The permittee shall include in its quarterly excess emission reports each period of time when the selective catalytic reduction bypass dampers are not 100 percent closed, the reason why they were not 100 percent closed and the actions taken to prevent such occurrence from happening again.
 - (8) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).
 - (9) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- 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:
0.020 lb of PE per million Btu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly refinery fuel gas or natural gas combustion rate, in million standard cubic feet per hour, by the appropriate particulate emission factor, in lb(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the process heater. If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the methods and procedures specified in Methods 1 through 4, and 5 of 40 CFR, Part 60, Appendix A, and the requirements specified in OAC rule 3745-17-03(B)(9).
 - b. Emission Limitation:
1.0 lb of SO₂ per million Btu of actual heat input



Applicable Compliance Method:

This limit is less stringent than firing refinery fuel gas (or combined fuel stream, if applicable) with a maximum H₂S content of 230 mg/dscm (0.10 grain/dscf) in this emissions unit. As long as the permittee maintains compliance with the H₂S operational restriction in section c)(1), compliance with the SO₂ limitation will be assumed.

c. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible particulate emission limitation above in accordance with the methods and procedures specified in Method 9 of 40 CFR, Part 60, Appendix A, and the requirements specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

0.3925 ton of VOC/month, averaged over a rolling, 12-month period from fugitive equipment leaks

Applicable Compliance Method:

The emission limitation is associated with the modification to the Isocracker Recycle Splitter tower section to increase kerosene production to 20,000 barrels per day, based on the maximum expected number of new leak detection and repair (LDAR) components and calculations provided by the permittee using U.S. EPA Protocol Document for Equipment Leaks, EPA-453/R-95-017, November 1995.

Compliance with the ton(s) of VOC per month emission limitation, averaged over a 12-month rolling period, shall be determined in accordance with the record keeping requirements established in d)(14) above.

e. Emission Limitation:

0.009 lbNO_x/million Btu of actual heat input based upon a rolling, 365-day block average

Applicable Compliance Method:

Compliance shall be based upon the monitoring and record keeping requirements specified in sections d)(6) through d)(12) for this emissions unit. If required, the permittee shall determine compliance with the NO_x emission limitation by using Methods 1 through 4, and 7 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods.



f. Emission Limitation:

230 mg/dscm (0.10 grain/dscf)(the equivalent concentration is 162 parts per million by volume) of H₂S in the refinery fuel gas, or combined fuel stream if applicable

Applicable Compliance Method:

Compliance shall be based upon the monitoring and record keeping requirements specified in sections d)(2) through d)(5) for this emissions unit. If required, the permittee shall determine compliance with the H₂S emission limitation by using Method 15 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods.

g) Miscellaneous Requirements

(1) None.