

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

4/28/2014

Certified Mail

Gregory Taylor
The Lubrizol Corporation - Wickliffe Facility
29400 Lakeland Boulevard
Wickliffe, OH 44092-2298

Facility ID: 0243150025
Permit Number: P0085075
County: Lake

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice, the Statement of Basis, 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

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 if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,


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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania

PUBLIC NOTICE
4/28/2014 Issuance of Draft Air Pollution Title V Permit

The Lubrizol Corporation - Wickliffe Facility
29400 Lakeland Boulevard,
Wickliffe, OH 44092-2298
Lake County

FACILITY DESC.: All Other Basic Organic Chemical Manufacturing

PERMIT #: P0085075

PERMIT TYPE: Renewal

PERMIT DESC: Renewal Title V permit for boilers, parts cleaning, engine test facility, and North and South Pilot plants equipped with flare, thermal incinerator and scrubber to control emissions.

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: John Polak, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0243081207
Facility Name:	CFF of Avery Dennison
Facility Description:	Adhesive coating operations
Facility Address:	5750 Heisley Road, Mentor, OH 44060
Permit #:	P0110057, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.		40 CFR 63 Subpart JJJ	Statement that K001, K002, and K003 are subject to Subpart JJJ and where to find the complete rule on-line
B.3.		IEU list	IEU listing



C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements													
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K001	For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight.	21-09(F)(2)(a)		N	N	Y	N	Y	Y	N	N	N	M – Monthly monitoring of coating usage and formulation R – monthly record of coating usage and formulation R – monthly record of VOC content of each coating and cleanup material Rp – quarterly deviation reports
K001 K002 K003	For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating.	21-09(F)(2)(a)											M – Monthly monitoring of coating usage and formulation R – monthly record of coating usage and formulation R – monthly record of VOC content of each coating and cleanup material Rp – quarterly deviation reports
K001 K002 K003	For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer,	21-09(F)(2)(a)											M – Monthly monitoring of coating usage and formulation R – monthly record of coating usage and formulation R – monthly record of VOC content of each coating and cleanup material Rp – quarterly deviation reports



	0.08 lb VOC / lb of coating.												
K001 K002 K003	Work practices	21-09(F)(2)(b)		N	Y	Y	N	Y	Y	N	N	N	OR- work practices to minimize VOC emissions from cleanup operations outside of the PTE M – Monthly checks on worker compliance with work practices R – Monthly records of compliance with work practices Rp – Quarterly reports of any deviations from work practices
K001	Volatile organic compounds (VOC) emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	OR – for each calendar year of operation this emissions unit shall be operated so as not to exceed maximum year-to-date emission limitation at the end of each month R – monthly record of coating usage and formulation R – monthly record of VOC content of each coating and cleanup material Rp – annual reports of VOC emissions
K002	Volatile organic compounds (VOC) emissions shall not exceed 21.0 pounds per hour from coatings and cleanup materials. Nitrogen oxides (NOx) emissions shall not exceed 1.5 pounds per hour.	31-05(A)(3)		N	Y	N	N	Y	Y	N	N	N	OR – the permittee shall use low NOx burners R – daily coating and cleanup material specifications and VOC emissions Rp – Quarterly deviation reports of VOC emissions identifying each day average hourly emission rate was exceeded
K002	The permittee shall only employ emulsions (water based coatings) with a maximum VOC content of 0.0623 pound per	31-05(A)(3)		N	Y	N	N	Y	Y	Y	N	N	Rp – identification of each month during which any noncomplying coatings were employed, and the actual coating content, in pounds of VOC per gallon of coating for each coating ET – US EPA Method 24 shall be used to determine VOC content of the coatings or other EPA test method, including SW-846



Statement of Basis
 CFF of Avery Dennison
Permit Number: P0110057
Facility ID: 0243081207

	gallon of coating in this emissions unit.													
K003	<p>Volatile organic compounds (VOC) emissions from the coating line shall not exceed 27.6 pounds per hour as a daily average, including cleanup, and 121 tons per year.</p> <p>Nitrogen Oxides (NOx) emissions from the ovens and web treater shall not exceed 1.40 pounds per hour and 6.2 tons per year.</p> <p>Carbon monoxide (CO) emissions from the ovens and web treater shall not exceed 1.20 pounds per hour and 5.2 tons per year.</p> <p>Only coatings with a maximum VOC content of 0.54 pound per gallon of coating shall be used in this emissions unit.</p>	31-05(A)(3)		N	Y	N	N	Y	Y	N	N	N	<p>OR – Silicone and top coat coatings shall not be applied concurrently</p> <p>OR – The permittee shall use low NOx burners in the ovens at all times when this emissions unit is in operation</p> <p>R – daily coating and cleanup material specifications and VOC emissions</p> <p>Rp – quarterly deviation reports of all exceedances</p>	
K001 K002 K003	0.20 kg of VOC/kg of coating solids applied, calculated		40 CFR 60, Subpart	N	N	Y	N	Y	Y	N	N	N	<p>M – daily monitoring of coating usage and formulation</p> <p>R – daily record of coating usage and formulation</p>	



Statement of Basis
 CFF of Avery Dennison
Permit Number: P0110057
Facility ID: 0243081207

	as a mass-weighted average for each calendar month		RR											Rp – 30 days after a record showing exceedance of standard
K001 K002 K003	Shall not discharge organic HAP emissions into the atmosphere of more than 4 % of the mass of coatings applied or more than 20 % of the mass of coating solids applied calculated for each month		40 CFR Part 63, Subpart JJJJ	N	N	M	N	Y	Y	N	N	N		R – specifications of each coating employed and calculate average of the mass of HAP emissions per mass of coatings solids applied using equations in 63.3370(c)(4) R – average of the mass of HAP emissions per mass of coating applied , in kg HAP/kg coating applied Rp – Semi-annual reporting of exceedances of 4% of mass of coatings and 20% of the mass of coating solids applied



DRAFT

**Division of Air Pollution Control
Title V Permit**

for

The Lubrizol Corporation - Wickliffe Facility

Facility ID:	0243150025
Permit Number:	P0085075
Permit Type:	Renewal
Issued:	4/28/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
The Lubrizol Corporation - Wickliffe Facility

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Draft Title V Permit
The Lubrizol Corporation - Wickliffe Facility
Permit Number: P0085075
Facility ID: 0243150025
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0243150025
Facility Description:
Application Number(s): A0015692
Permit Number: P0085075
Permit Description: Renewal Title V permit for boilers, parts cleaning, engine test facility, and North and South Pilot plants equipped with flare, thermal incinerator and scrubber to control emissions.
Permit Type: Renewal
Issue Date: 4/28/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0085074

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

The Lubrizol Corporation - Wickliffe Facility
29400 Lakeland Boulevard
Wickliffe, OH 44092-2298

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
The Lubrizol Corporation - Wickliffe Facility
Permit Number: P0085075
Facility ID: 0243150025
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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - (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, Northeast 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.



- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Draft Title V Permit

The Lubrizol Corporation - Wickliffe Facility

Permit Number: P0085075

Facility ID: 0243150025

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Northeast District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
The Lubrizol Corporation - Wickliffe Facility
Permit Number: P0085075
Facility ID: 0243150025
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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.
2. 40 CFR Part 63, MACT Requirements

The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJJJ:

Emission Unit B001 is a gas-fired boiler, as defined in 40 CFR Part 63, Subpart JJJJJJ (NESHAP for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source), and therefore, this emission unit is not subject to any of the requirements set forth in Subpart JJJJJJ. As a gas-fired boiler exempted from Subpart JJJJJJ, Emission Unit B001 may only burn liquid fuel during periods of gas curtailment, gas supply emergencies, or periodic testing of liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Emission Unit B002 is a gas-fired boiler, as defined in 40 CFR Part 63, Subpart JJJJJJ (NESHAP for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source), and therefore, this emission unit is not subject to any of the requirements set forth in Subpart JJJJJJ. As a gas-fired boiler exempted from Subpart JJJJJJ, Emission Unit B002 may only burn liquid fuel during periods of gas curtailment, gas supply emergencies, or periodic testing of liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Emission Unit B003 is a gas-fired boiler, as defined in 40 CFR Part 63, Subpart JJJJJJ (NESHAP for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source), and therefore, this emission unit is not subject to any of the requirements set forth in Subpart JJJJJJ. This unit is not permitted to burn any other fuels.

Emission Unit B005 is a gas-fired boiler, as defined in 40 CFR Part 63, Subpart JJJJJJ (NESHAP for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source), and therefore, this emission unit is not subject to any of the requirements set forth in Subpart JJJJJJ. This unit is not permitted to burn any other fuels.

Emission Unit B006 is a gas-fired boiler, as defined in 40 CFR Part 63, Subpart JJJJJJ (NESHAP for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source), and therefore, this emission unit is not subject to any of the requirements set forth in Subpart JJJJJJ. This unit is not permitted to burn any other fuels.

If you are burning oil for gas curtailment only, that is not in the oil subcategory, then the source is exempt. See 63.11195(e) and 63.11237 definition of gas fuel boiler.

The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> (<http://efcr.gpoaccess.gov/>) or by contacting the Ohio EPA Northeast District Office.

This facility is not subject to 40 CFR Part 63, Subpart DDDDD since the facility is not a major source of HAP as defined in §63.7575.



Draft Title V Permit

The Lubrizol Corporation - Wickliffe Facility

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3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-77-01:

DAPC ID	EU Description	Applicable rule(s)
P102	Corporate building backup generator	PBR11682
P103	South research building backup generator	PBR11682
P104	SPP fume incinerator backup generator	PBR11682
P105	Mechanical testing lab backup generator	PBR11682
P107	Boiler room backup generator	PBR11682
P109	Building 28 backup generator	PBR11682
P110	Main guardhouse generator	PBR11682
P111	Bldg. 25 Generator	PBR11682
P114	PBX phone room generator	PBR11682
P115	Bldg. 52 Generator	PBR11682
P116	Firewater pump engine	PBR11682
P117	Bldg. 15 Emergency Generator	PBR11682
P118	Bldg. 40 Emergency Generator	PBR11682



Draft Title V Permit
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C. Emissions Unit Terms and Conditions



1. B001, Keeler Boiler

Operations, Property and/or Equipment Description:

Boiler - Gas and Oil Rated 27 MMBTU/hr Keeler Co. Model CP

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-18-06(D)	Sulfur dioxide emissions shall not exceed 1.6 lbs./mmBtu actual heat input.

(2) Additional Terms and Conditions

a. As used in the terms and conditions for this emissions unit, "number two fuel oil" and/or "oil" includes number two fuel oil blends and diesel fuel blends, containing water and additives, and low sulfur diesel (<15 PPM).

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]



- (2) The quality of the oil burned in this emissions unit shall have a sulfur and a heat content to sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide/mmBtu actual heat input.

Compliance with the above-mentioned specification shall be determined by using analytical results provided by the permittee. For analytical purposes, the permittee shall sample the on-site oil storage tank on the first day the emissions unit is fired with oil and on the first day that oil is burned following the addition of new oil to the on-site oil storage tank. In the event that the permittee is burning low sulfur diesel fuel and retains information of sulfur content, no sampling and testing shall be required.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(D)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-06(D)]

- (2) For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-18-04(E)(3), OAC rule 3745-18-04(I), and OAC rule 3745-77-07(C)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall submit, on a quarterly basis, copies of the permittee's analyses of oil or specification of low sulfur diesel fuel which is burned in this emissions unit. The permittee's analyses shall document the sulfur content (percent) and heat content (Btu/gallon). The following information shall also be included with the copies of the permittee's analyses:
- a. the date and total quantity of oil added to the on-site oil storage tank (gallons);
 - b. the average sulfur dioxide emissions rate* (lb/mmBtu) for the oil burned in this emissions unit during each calendar month; and
 - c. the average heat content* (Btu/gallon) of the oil burned in this emissions unit during each calendar month.

*Based upon an arithmetic average of the values obtained each calendar month from all the oil analyses.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil burned during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)]

c. Emission Limitation:

1.6 pounds of sulfur dioxide emissions per million Btu input.

Applicable Compliance Method:

To determine the actual emission rate for SO₂, the following equation shall be used:

$$E \text{ (lb/mmBtu)} = [(1 \times 10^6) / H] \times D \times S \times 1.974$$

Where:

E = SO₂ emission rate, in lb/mmBtu;

H = heat content of the liquid fuel, in Btu/gal;

D = density of the liquid fuel, in lb/gal; and

S = decimal fraction of sulfur in the liquid fuel.

(2) If required the permittee shall conduct, or have conducted, SO₂ emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 1.6 lbs./mmBtu actual heat input in accordance with the following requirements:

- a. Compliance with the allowable mass emission rate for SO₂ shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures in OAC rule 3745-18-04.
- b. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.
- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that



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the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04]

g) Miscellaneous Requirements

(1) None.



2. B002, Erie City VL Boiler

Operations, Property and/or Equipment Description:

Boiler - Gas and Oil Rated: 33 MMBTU/hr. Erie City Model VL

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-18-06(D)	Sulfur dioxide emissions shall not exceed 1.6 lbs./mmBtu actual heat input.

(2) Additional Terms and Conditions

a. As used in the terms and conditions for this emissions unit, "number two fuel oil" and/or "oil" includes number two fuel oil blends and diesel fuel blends, containing water and additives and low sulfur diesel (<15 PPM).

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]



- (2) The quality of the oil burned in this emissions unit shall have a sulfur and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide/mmBtu actual heat input.

Compliance with the above-mentioned specification shall be determined by using analytical results provided by the permittee. For analytical purposes, the permittee shall sample the on-site oil storage tank on the first day the emissions unit is fired with oil and on the first day that oil is burned following the addition of new oil to the on-site oil storage tank. In the event that the permittee is burning low sulfur diesel fuel and retains information of sulfur content, no sampling and testing shall be required.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(D)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(D)]

- (2) For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-18-04(E)(3), OAC rule 3745-18-04(I), and OAC rule 3745-77-07(C)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall submit, on a quarterly basis, copies of the permittee's analyses of oil or specification of low sulfur diesel fuel which is burned in this emissions unit. The permittee's analyses shall document the sulfur content (percent) and heat content (Btu/gallon). The following information shall also be included with the copies of the permittee's analyses:
- a. the date and total quantity of oil added to the on-site oil storage tank (gallons);
 - b. the average sulfur dioxide emissions rate* (lb/mmBtu) for the oil burned in this emissions unit during each calendar month; and
 - c. the average heat content* (Btu/gallon) of the oil burned in this emissions unit during each calendar month.

*Based upon an arithmetic average of the values obtained each calendar month from all the oil analyses.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil burned during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)]

c. Emission Limitation:

1.6 pounds of sulfur dioxide emissions per million Btu input.

Applicable Compliance Method:

To determine the actual emission rate for SO₂, the following equation shall be used:

$$E \text{ (lb/mmBtu)} = [(1 \times 10^6) / H] \times D \times S \times 1.974$$

Where:

E = SO₂ emission rate, in lb/mmBtu;

H = heat content of the liquid fuel, in Btu/gal;

D = density of the liquid fuel, in lb/gal; and

S = decimal fraction of sulfur in the liquid fuel.

(2) If required, the permittee shall conduct, or have conducted, SO₂ emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 1.6 lbs./mmBtu actual heat input in accordance with the following requirements:

- a. Compliance with the allowable mass emission rate for SO₂ shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures in OAC rule 3745-18-04.
- b. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.
- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that



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the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04]

g) Miscellaneous Requirements

(1) None.



3. B003, Erie City VC Boiler

Operations, Property and/or Equipment Description:

Boiler - Gas Rated: 44.5 MMBTU/hr. Erie City Model VC

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(D)]



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-17-03(B)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-17-03(B)]

g) Miscellaneous Requirements

- (1) None.



4. B005, South Property Water Heater

Operations, Property and/or Equipment Description:

A 17 mmBtu/hr natural gas fired water heater (North) (BL-09-08A/SR)

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10-(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	40 CFR Part 60, Subpart Dc	None.
d.	OAC rule 3745-31-05 PTI 02-0115	Emissions of sulfur dioxide shall not exceed 0.0006 lb/mmBtu heat input. Emissions of nitrogen oxides shall not exceed 0.14 lb/mmBtu heat input. Emissions of carbon monoxide shall not exceed 0.084 lb/mmBtu heat input. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-10.
e.	OAC rule 3745-18-06	Less stringent than BAT limit.



- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in this emissions unit.
[Authority for term: OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of the amount of natural gas combusted during each month.
[Authority for term: OAC rule 3745-77-07(C)(1)]
 - (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- e) Reporting Requirements
 - (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]



b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall determine compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

c. Emission Limitation:

Emissions of sulfur dioxide shall not exceed 0.0006 lb/mmBtu heat input.

Applicable Compliance Method:

Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion - Fifth Edition, 7/98), using the following equation:
 $E(\text{lb/mmBtu}) = EF / 1000 \text{ Btu/scf}$

Where:

EF = emission factor, 0.6 lb SO₂ per million scf.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

d. Emission Limitation:

Emissions of nitrogen oxides shall not exceed 0.14 lb/mmBtu heat input.

Applicable Compliance Method:

Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion - Fifth Edition, 7/98), using the following equation:

$$E(\text{lb/mmBtu}) = EF / 1000 \text{ Btu/scf}$$

Where:

EF = emission factor, 100 lbs. NO_x per million scf

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

e. Emission Limitation:

Emissions of carbon monoxide shall not exceed 0.084 lb/mmBtu heat input.



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Applicable Compliance Method:

Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion - Fifth Edition, 7/98), using the following equation:

$$E(\text{lb/mmBtu}) = EF / 1000 \text{ Btu/scf}$$

Where:

EF = emission factor, 84 lbs. CO per million scf

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

g) Miscellaneous Requirements

(1) None.



5. B006, South Property Water Heater

Operations, Property and/or Equipment Description:

A 17 mmBtu/hr natural gas fired water heater (South) (BL-09-08A/SR)

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10-(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	40 CFR Part 60, Subpart Dc	None.
d.	OAC rule 3745-31-05 PTI 02-0115	Emissions of sulfur dioxide shall not exceed 0.0006 lb/mmBtu heat input. Emissions of nitrogen oxides shall not exceed 0.14 lb/mmBtu heat input. Emissions of carbon monoxide shall not exceed 0.084 lb/mmBtu heat input. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-10.
e.	OAC rule 3745-18-06	Less stringent than BAT limit.



- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in this emission unit.
[Authority for term: OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of the amount of natural gas combusted during each month.
[Authority for term: OAC rule 3745-77-07(C)(1)]
 - (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain records of the type and quantity of fuel burned in this emissions unit.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- e) Reporting Requirements
 - (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Visible particulate emissions from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]



b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall determine compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

c. Emission Limitation:

Emissions of sulfur dioxide shall not exceed 0.0006 lb/mmBtu heat input.

Applicable Compliance Method:

Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion -Fifth Edition, 7/98), using the following equation:

$$E \text{ (lb/mmBtu)} = EF / 1000 \text{ Btu/scf}$$

Where:

EF = emission factor, 0.6 lb SO₂ per million scf

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

d. Emission Limitation:

Emissions of nitrogen oxides shall not exceed 0.14 lb/mmBtu heat input.

Applicable Compliance Method:

Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion - Fifth Edition, 7/98), using the following equation:

$$E \text{ (lb/mmBtu)} = EF / 1000 \text{ Btu/scf}$$

Where:

EF = emission factor, 100 lbs. NO_x per million scf

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

e. Emission Limitation:

Emissions of carbon monoxide shall not exceed 0.084 lb/mmBtu heat input.



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Compliance shall be based on the emission factor outlined in AP-42, Section 1.4 (Natural Gas Combustion - Fifth Edition, 7/98), using the following equation:

$$E \text{ (lb/mmBtu)} = EF / 1000 \text{ Btu/scf}$$

Where:

EF = emission factor, 84 lbs. CO per million scf

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI# 02-10115]

g) Miscellaneous Requirements

(1) None.



6. L003, Bldg 12 Parts Cleaning

Operations, Property and/or Equipment Description:

Parts Cleaning Area (Building 12) – Includes a spray booth and dip tanks

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 3745-21-09(O)(2)	Emissions of volatile organic compounds from the solvent spray booth shall not exceed 5 tons per year. See Additional Terms and Conditions b)(2)a. See c)(1).

(2) Additional Terms and Conditions

a. In accordance with paragraph (O)(6)(a) of OAC rule 3745-21-09, the requirement of OAC rule 3745-21-09(O)(2)(d)(v) (i.e., that any solvent spray be a solid fluid stream at a pressure that does not exceed ten pounds per square inch gauge) shall not apply to the solvent spray booth provided that the VOC emissions from the booth is less than five tons per calendar year.

c) Operational Restrictions

(1) Each owner or operator of a cold cleaner shall:

a. Equip the cold cleaner with either:

i. a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at one hundred degrees Fahrenheit, or the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand; or



- ii. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided the sink-like work area has an open drain area of less than sixteen square inches and provided the solvent neither is heated above one hundred twenty degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit.
- b. Equip the cold cleaner with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining unless an internal type drainage device cannot fit into the cleaning system.
- c. Install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:
 - i. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - ii. water cover (solvent must be insoluble in and heavier than water); or
 - iii. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director.
- d. Operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:
 - i. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - ii. store waste solvent in covered containers;
 - iii. close the cover whenever parts are not being handled in the cleaner;
 - iv. drain the cleaned parts until dripping ceases; and
 - v. clean only materials that are neither porous nor absorbent

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(O)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the Director upon verbal or written request:
 - a. All control equipment maintenance.



- b. For cold cleaners, the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit.
- c. The results of all emissions tests conducted to demonstrate compliance with the terms and conditions of this permit.
- d. The annual solvent usage in the solvent spray booth.
- e. The amount of solvent sent offsite for recycle or disposal from the solvent spray booth.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) Each year, the permittee shall submit an annual report, by January 31, for the preceding calendar year. Each annual report shall specify the annual VOC emissions for this emissions unit, determined using the equation provided in f)(1)a. of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Emissions of volatile organic compounds from the solvent spray booth shall not exceed 5 tons per year.

Applicable Compliance Method:

To determine the actual VOC emission rate from the solvent spray booth, the following equation shall be used:

$$E = (Ls - Lw) \times D/2000$$

Where;

E = VOC emission rate, in tons/year;

Ls = liquid volume of cleaning solvent employed in the solvent spray booth each year, in gallons;

Lw = liquid volume of cleaning solvent sent offsite as waste from the solvent spray booth, in gallons; and



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D = density of the cleaning solvent utilized in the solvent spray booth, in pounds per gallon.

If more than one type of cleaning solvent is employed in the solvent spray booth, the above equation shall be used for each cleaning solvent. The total volatile organic compound emission rate shall be determined as the sum of the annual volatile organic compound emission rates for all cleaning solvents employed in the solvent spray booth.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. P009, Engine Test Facility

Operations, Property and/or Equipment Description:

Engine Test Facility

- 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 3745-17-07(A)	<u>Engine Test Stands, including 48 test stands (gasoline-fueled and diesel fueled)</u> None. See Additional Terms and Conditions b)(2)a. below
b.	OAC rule 3745-17-11(B)(1)	<u>Engine Test Stands, including 48 test stands (gasoline-fueled and diesel fueled)</u> None. See Additional Terms and Conditions b)(2)b. below
c.	OAC rule 3745-17-07(A)	<u>6 Engines (4 gasoline-fueled and 2 diesel-fueled) used to operate mechanical equipment</u> Visible particulate emission shall not exceed 20 percent opacity as a 6-minute average except as provided by the rule.
d.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input. See Additional Terms and Conditions b)(2)c below.
e.	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart ZZZZ (Stationary RICE area source GACT)	Exempt, see Section 63.6585

(2) Additional Terms and Conditions

- a. These engine test stands are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because these test stands are not subject to the requirements of OAC rule 3745-17-11.
- b. The uncontrolled mass rate of particulate emissions from the engine test stands is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- c. The internal combustion engines used to operate mechanical equipment have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks of the engines used to operate mechanical equipment, when the engines are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and



- e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, particulate matter emissions shall be determined in accordance with the following method(s): Methods 1, 2, 3, 4, and 5 of 40 CFR Part 60, Appendix A, and procedures from OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



8. P011, North, South Pilot Plant

Operations, Property and/or Equipment Description:

North and South Pilot Plant Reactors controlled by a wet scrubber and thermal incinerator with a flare as backup.

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 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(C).
b.	OAC rule 3745-21-07(M)(2)	See b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. If a temperature deviation occurs, the facility can opt to demonstrate compliance through stack testing and establish a lower operating temperature.

[Authority for term: OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. This log shall also indicate when the reactors were vented to the backup flare.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. The reports shall also indicate the date(s) and time(s) that the reactors vented to the backup flare.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:



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- a. The emission testing shall be conducted within 3 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency (capture and control) limitation for organic compounds and the ninety percent control efficiency requirement for the thermal incinerator.
- c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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g) Miscellaneous Requirements

(1) None.



9. P012, North Pilot Plant Expansion

Operations, Property and/or Equipment Description:

North Pilot Plant Expansion Reactors controlled by a wet scrubber and thermal incinerator with a flare as backup.

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 3745-18-06	Less stringent than BAT limit.
b.	OAC rule 3745-21-07(M)(2)	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-31-05(A)(3)	See b)(2)b. through b)(2)d. below The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07.

(2) Additional Terms and Conditions

a. The permittee shall employ Best Available Technology in the design, operation, and maintenance of this emissions unit and its air pollution control equipment in order to minimize fugitive and process emissions of volatile organic compounds into the ambient air.

b. The National Air Oil Burner (flare), WS-1, shall be operated with no visible emissions except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.



- c. The thermal incinerator, WN-1, shall be operated to reduce the VOC emissions vented to it with a destruction efficiency of at least ninety-eight percent by weight.
- d. The packed tower scrubber system, M-624 A-B-C, shall be designed and operated to reduce the hydrogen sulfide and hydrochloric acid vented to it with a removal efficiency of at least ninety-eight percent by weight.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. If a temperature deviation occurs, the facility can opt to demonstrate compliance through stack testing and establish a lower operating temperature.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) This emissions unit shall not be used to manufacture more than 2.2 million pounds of product in any one year.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall employ good maintenance practices to prevent, detect, and repair VOC leaks from the process equipment, control device, and other equipment containing or conveying VOCs.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (4) The flare shall be operated with a pilot flame present at all times.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (5) The minimum free sodium hydroxide concentration in the scrubber liquor shall be the minimum concentration established during the most recent emission test that demonstrated the emissions unit was in compliance. If a deviation in the minimum free sodium hydroxide concentration occurs, the facility can opt to demonstrate compliance through stack testing and establish a lower minimum free sodium hydroxide concentration.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall collect and record the following information for each day:
- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. This log shall also indicate when the reactors were vented to the backup flare.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall monitor and record the free sodium hydroxide concentration (percent) of the scrubber liquor while the emissions unit is in operation. The permittee shall record the percent free sodium hydroxide concentration before and after each batch reaction. The percent free sodium hydroxide concentration before and after some batch reactions, i.e., those reactions where the operators know before the reaction takes place (based upon operating experience) that the free sodium hydroxide concentrations will be well above the concentration required by term A.II.5, may be based on the stoichiometry of the reactions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall properly operate and maintain equipment to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee for proper operation of such monitoring device and recorder.

The permittee shall record periods during which there was no pilot flame.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall maintain annual records of the amount of product, by weight, produced in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. The reports shall also indicate the date(s) and time(s) that the reactors vented to the backup flare.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber liquor free sodium hydroxide concentration (percent) did not comply with the free sodium hydroxide concentration established during the most recent emission test that demonstrated the emissions unit was in compliance. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit annual reports of the amount of product, by weight, produced in this emissions unit. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The thermal incinerator, WN-1, shall be operated to reduce the VOC emissions vented to it with an efficiency of at least ninety-eight percent by weight.



Applicable Compliance Method(s):

Compliance shall be determined in accordance with f)(2) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The packed tower scrubber system, M-624 A, B, C, shall be designed and operated to reduce the hydrogen sulfide and hydrochloric acid vented to it with an efficiency of at least ninety-eight percent by weight.

Applicable Compliance Method(s):

The permittee shall conduct, or have conducted, emission testing for the packed tower scrubber system, M-624 A, B, C, in accordance with the following requirements:

The emission testing shall be conducted within 3 months after issuance of this permit.

Inlet and outlet emission testing shall be conducted to determine compliance with the removal efficiency for hydrogen sulfide and hydrochloric acid of ninety-eight percent, by weight.

Appropriate test methods shall be employed to demonstrate compliance with the removal efficiency requirement for the packed tower scrubber. The test methods and procedures selected shall be subject to Ohio EPA approval and shall be based on a consideration of the air contaminants present and their total concentration and the potential presence of interfering gases.

The emission tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

No visible emissions from the flare, except for a period not to exceed a total of 5 minutes during any one hundred and twenty consecutive minutes.

Applicable Compliance Method(s):

Compliance shall be determined in accordance with U.S. EPA Method 22, as set forth in 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The emission testing shall be conducted within 3 months after issuance of the permit.

The emission testing shall be conducted to demonstrate compliance with the overall control efficiency (capture and control) limitation for organic compounds and the ninety-eight percent control efficiency requirement for the thermal incinerator.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The emission tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the



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person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.