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

9/16/2014

Certified Mail

Facility ID: 0448011640
Permit Number: P0116060
County: Lucas

Steven Hopper
Process Solutions a division of Veolia Water Americas
4760 World Houston Pkwy, Ste 100
Houston, TX 77032

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services as indicated on page one of your permit.

Sincerely,

Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Toledo Department of Environmental Services

FINAL

Division of Air Pollution Control
Title V Permit
for
Process Solutions a division of Veolia Water Americas

Facility ID:	0448011640
Permit Number:	P0116060
Permit Type:	Renewal
Issued:	9/16/2014
Effective:	10/7/2014
Expiration:	10/7/2019

Division of Air Pollution Control
Title V Permit
for
Process Solutions a division of Veolia Water Americas

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 10
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 12
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 19
1. P001, Centrifuge and Thermal Dewatering Unit 20

Authorization

Facility ID:	0448011640
Facility Description:	Sludge dewatering process generates solids and water/oil mixture returned to wastewater treatment plant. The WWTP then processes this material to recover oil to recylce back to the refinery. Solids generated by Process Solutions are disposed offsite.
Application Number(s):	A0047631
Permit Number:	P0116060
Permit Description:	Title V Permit Renewal for the sludge dewatering process that generates solids and water/oil mixture returned to wastewater treatment plant. (The WWTP then processes this material to recover oil to recylce back to the refinery). Solids generated by Process Solutions are disposed offsite.
Permit Type:	Renewal
Issue Date:	9/16/2014
Effective Date:	10/7/2014
Expiration Date:	10/7/2019
Superseded Permit Number:	P0088446

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

Process Solutions a division of Veolia Water Americas
1819 Woodville Road
Oregon, OH 43616

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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 Toledo Department of Environmental Services. 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

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 recordingsfor 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 submittedscheduled 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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 permitexcept 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services) 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 intermittentconsistent 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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, noemissions unit identified in this permit that has beencertified 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 RequirementsUnder 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 theToledo Department of Environmental Services.

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 Toledo Department of Environmental Services. 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 RequirementsUnder 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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.

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 ofan 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 Toledo Department of Environmental Services, 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.

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. Toledo Refining Company (TRC) (formerly Sunoco, Inc.) is the generator of waste streams for which the total annual benzene quantity exceeds 10 megagrams per year (11 tons per year), so 40 CFR Part 61, Subpart FF is applicable to the Toledo Refining Company refinery. TWO LLC Wastewater Treatment Unit and Process Solutions are independent companies which, by contract, are responsible to treat the Toledo Refining Company refinery waste streams. Portions of 40 CFR Part 61, Subpart FF are applicable to the operations of both TWO LLC Wastewater Treatment Unit and Process Solutions. Process Solutions will be responsible to the extent of their control of the benzene treatment process.

   The relation of these three firms is described below.

   Toledo Refining Company (TRC), a refinery operating in Lucas County, contracts the treatment of its wastewater to TWO LLC Wastewater Treatment Unit.

   TWO LLC Wastewater Treatment Unit owns and operates an API oil-water separator and other wastewater treatment equipment which accepts wastewater which originates, at this time, exclusively from TRC related facilities. TWO LLC Wastewater Treatment Unit and TRC occupy adjacent and separate areas within the refinery boundaries. TWO LLC Wastewater Treatment Unit produces treated water and oil which are returned to TRC as separate streams; and a mixture of oil, water, and solids ("sludge") which are sent to Process Solutions for further processing.

   Process Solutions operates sludge dewatering equipment as a part of the wastewater treatment process and occupies adjacent separate areas within the refinery boundaries to both TWO LLC and TRC. Process Solutions receives the API oily sludge or bio-sludge from TWO LLC or TRC, exclusively (at this time). Process Solutions separates the waste streams into an oil/water mixture and dewatered oily sludge or bio-sludge. The oil/water mixture is returned to TWO LLC, where the oil is returned to TRC. The solids are loaded into roll-off boxes and later disposed offsite.

3. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   F001 – Maintenance welding by outside contractors

   F002 – Clean-up activities associated with remedial spills within facility

   F003 – Small activities performed by outside contractors while cleaning equipment

   F004 – Unpaved area around pad

   T003 - Two 400 gallon each polymer tanks

C. Emissions Unit Terms and Conditions

1. P001, Centrifuge and Thermal Dewatering Unit

Operations, Property and/or Equipment Description:

P001 - Wastewater sludge dewatering process (centrifuge and thermal dewatering unit) and vapor recovery system (condenser and carbon canisters).

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) See d)(4) through (7) and e)(4).

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
For Wastewater:		
a.	OAC rule 3745-31-05(A)(3) PTI 04-01341 issued 12/16/03	0.55 pound per hour of volatile organic compounds (VOC) 2.42 tons of VOC per year from the control device and roll-off box See b)(2)a. and b)(2)h.
b.	40 CFR Part 63, Subpart CC (40 CFR Part 63.640 – 63.656) [In accordance with 40 CFR 63.640(a) and its relationship with Toledo Refining Company, this emissions unit is considered to be part of an existing petroleum refinery subject to the emission limitations/control measures specified in this section.]	See b)(2)b.
c.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 61, subpart FF (40 CFR Part 61.340-358) [In accordance with 40 CFR 63.647(a), this emissions unit is considered to be part of an existing petroleum refinery subject to the emission limitations/control measures specified in this section for Group 1 and Group 2 wastewater streams.]	See b)(2)d.
e.	OAC rule 3745-21-09(L)(2)(a)	See b)(2)e.
For Equipment Leaks:		
f.	40 CFR Part 63, Subpart CC (40 CFR Part 63.640 – 63.656) [In accordance with 40 CFR 63.640(a) and its relationship with Toledo Refining Company, this emissions unit is considered to be part of an existing petroleum refinery subject to the emission limitations/control measures specified in this section.]	See b)(2)f.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)c.
h.	OAC rule 3745-21-09(T)	See b)(2)g.
	Air Toxics:	
i.	ORC 3704.03(f)(4)d.	See d)(4) through (7) and e)(4)

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart CC; 40 CFR Part 63, Subpart A; and 40 CFR Part 61, Subpart FF.

b. [40 CFR 63.640 of subpart CC]

i. [63.640(c)]
For the purpose of 40 CFR Part 63, Subpart CC, the affected source shall comprise all emission points, in combination, listed in 63.640(c)(1) through (c)(7) that are located at a single refinery plant site, i.e., [63.640(c)(3)] all wastewater streams and treatment operations associated with petroleum refining process units; and [63.640(c)(4)] all equipment leaks.

ii. [63.640(e)(1)]
Where a storage vessel is used exclusively by a process unit, the storage vessel shall be considered part of that process unit.

iii. [63.647(a)]
For every Group 1 wastewater stream, the permittee shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF.

iv. [63.647(b)]
All terms not defined in 40 CFR Part 63.641 shall have the meaning given them in the Clean Air Act or in 40 CFR Part 61.341 in Subpart FF.

c. In accordance with 40 CFR 63.642(c), the permittee shall comply with the applicable portions 40 CFR Part 63, Subpart A as specified in Table 6 of 40 CFR Part 63, Subpart CC.

d. 40 CFR Part 61, subpart FF
*NOTE: see section B of this permit for the relationship between Toledo Refining Company, TWO LLC and Process Solutions in regards to treating the waste streams from the refinery.

i. [61.340(a)] APPLICABILITY
The provisions of 40 CFR Part 61, Subpart FF apply to the permittee of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by a petroleum refinery. The waste streams at hazardous waste treatment, storage, and disposal facilities subject to the provisions of this 40 CFR Part 61, Subpart FF are the benzene-containing hazardous wastes from the petroleum refinery. A hazardous waste treatment, storage, and disposal facility is a facility that must obtain a hazardous waste management permit under subtitle C of the Solid Waste Disposal Act

ii. [61.343(a)(1)] STANDARDS: TANKS
The permittee shall operate and maintain a fixed roof and closed-vent system that routes all organic vapors to a control device.

iii. [61.348(a)(1)(i)] STANDARDS: TREATMENT PROCESSES
Except as otherwise provided in 40 CFR Part 61.348(a)(5), the permittee shall operate, and maintain a treatment process that removes benzene

from the waste stream to a level less than 10 parts per million by weight (ppmw) on a flow-weighted annual average basis.

NOTE: this rule is cited for reference only. Process Solutions does not perform the final treatment of the waste streams but may play a part in the treatment process.

iv. [61.348(a)(2)] STANDARDS: TREATMENT PROCESSES
Each treatment process complying with 61.348(a)(1)(i) or (a)(1)(ii) shall be designed and operated in accordance with the appropriate waste management unit standards specified in 61.343 through 61.347 of this subpart. For example, if a treatment process is a tank, then the permittee shall comply with 61.343 of this subpart.

v. [61.348(e)] STANDARDS: TREATMENT PROCESSES
Except as specified in 61.348(e)(3) of this section, if the treatment process or wastewater treatment system unit has any openings (e.g., access doors, hatches, etc.), all such openings shall be sealed (e.g., gasketed, latched, etc.) and kept closed at all times when waste is being treated, except during inspection and maintenance.

vi. [61.349(a)(1)(i)] STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES
The closed vent system shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background

vii. [61.349(a)(2) and (a)(2)(ii)] STANDARDS: CLOSED-VENT SYSTEMS & CONTROL DEVICES
The control device shall be designed and operated in accordance with the following condition: a vapor recovery system (e.g., a carbon adsorption system or a condenser) shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater, or shall recover or control the benzene emissions vented to it with an efficiency of 98 weight percent or greater.

e. The requirements specified by this rule are less stringent than the requirements established in 40 CFR 61, subpart FF for tanks and/or containers.

f. [63.648(a)]
The permittee shall comply with the provisions of 40 CFR Part 60, Subpart VV and 63.648(b) except as provided in 63.648(a)(1), (a)(2) and 40 CFR Part 63.648(c) through (i).

i. [63.648(a)(1)]
For purposes of compliance with 40 CFR Part 63, Subpart CC, the provisions of 40 CFR Part 60, Subpart VV apply only to equipment in organic HAP service, as defined in 40 CFR Part 63.641.

ii. [63.648(a)(2)]
Calculation of percentage leaking equipment components for Subpart VV of 40 CFR Part 60 may be done on a process unit basis or a source-wide basis. Once the permittee has decided, all subsequent calculations shall be on the same basis unless a permit change is made

g. [OAC rule 3745-21-09(T)]

i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63, Subpart CC.

ii. The permittee shall comply with the VOC leak detection and repair program requirements of OAC rule 3745-21-09(T) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart CC for all VOC process equipment leaks.

h. The annual emission limitations were established for PTI purposes to reflect the potential to emit from all of the equipment comprising this process unit while utilizing a 98% effective VOC control device. Therefore, if adequate monitoring, record keeping and reporting requirements are maintained to demonstrate compliance with 98% effective VOC control efficiency requirement, compliance will be also demonstrated with the hourly and annual emission limitations.

c) Operational Restrictions

(1) [63.642] GENERAL STANDARDS - 40 CFR Part 63, Subpart CC
The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, subpart CC, including the following sections:

63.642(g)	Control emissions of organic HAP's to the level represented by the equation stated in 40 CFR 63.642(g) unless permittee complies with 63.642(k) instead
63.642(k)	Comply with the wastewater provisions in 63.647 and the requirements of 63.654 as applicable.

(2) [61.342] GENERAL STANDARDS - 40 CFR Part 61, Subpart FF
NOTE: see section B of this permit stating the relationship between the Toledo Refining Company, TWO LLC and Process Solutions in regards to treating the waste streams from the refinery.

The permittee shall comply with the applicable restrictions required under 40 CFR Part 61, subpart FF, including the following sections:

61.342(c)	Requirements for managing and treating benzene from facility waste (if applicable – see note above).

61.342(f)	Rather than treating the waste onsite, the permittee may elect to comply with 61.342(c)(1)(i) by transferring the waste offsite to another facility where the waste is treated in accordance with the requirements of 61.342(c)(1)(i).
61.342(g)	Compliance with this subpart is determined by review of facility records and results from tests and inspections using methods and procedures specified in 61.355.

(3) [60.482-1] STANDARDS: GENERAL - 40 CFR Part 60, Subpart VV
The permittee shall comply with the applicable restrictions required under 40 CFR Part60, subpart VV, including the following sections:

60.482-1(b)	Compliance with 60.482-2 through 60.482-10 will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 60.485
60.482-1(d)	Equipment in vacuum service is excluded from the requirements of 60.482-2 to 60.482-10 if it is identified as required in 60.486(e)(5).

d) Monitoring and/or Recordkeeping Requirements

(1) [40 CFR Part 63, subpart CC]
The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, subpart CC, including the following sections:

63.642(e)	GENERAL STANDARDS – keep copies of all applicable records and reports required by this subpart for at least 5 years. Records should be readily accessible within 24 hours.
63.648	EQUIPMENT LEAK STANDARDS
63.654(a)	RECORDKEEPING REQUIREMENTS - Comply with the record keeping and reporting provisions in 61.356 and 61.357 of 40 CFR Part 61, Subpart FF.
63.654(d)	The permittee shall comply with the record keeping and reporting provisions in 63.654(d)(1), (d)(2), (d)(5) and (d)(6) for equipment leaks

(2) [40 CFR Part 61, Subpart FF]
The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, subpart CC, including the following sections:

61.343	STANDARDS FOR TANKS - operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. The tanks are to be monitored annually for leaks. Those greater than 500 ppmv above background are considered leaking. First effort at repair is within 15 days. Visual inspections are required quarterly.
61.345	STANDARDS FOR CONTAINERS - operate, and maintain a cover on each container used to handle, transfer, or store waste. The containers are monitored annually for leaks. Those greater than 500 ppmv above background are considered leaking. First effort at repair is within 15 days. Visual inspections are required quarterly.
61.348	STANDARDS FOR TREATMENT PROCESSES - Treat waste streams to remove benzene to less than 10 ppmw. NOTE: see section B.2., Process Solutions is responsible to the extent of their control of the benzene treatment process.
61.348(e)(1)	Each seal, access door, and all other openings shall be checked by visual inspections initially and quarterly thereafter to ensure that no cracks or gaps occur and that openings are closed and gasketed properly
61.348(e)(2)	Except as provided in 61.350, when a broken seal or gasket or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.
61.348(e)(3)	If the cover and closed-vent system operate such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times if the following conditions are met: (i) The purpose of the opening is to provide dilution air to reduce the explosion hazard; (ii) The opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h); and (iii) The pressure is monitored continuously to ensure that the

	pressure in the treatment process and wastewater treatment system unit remain below atmospheric pressure.
61.349	STANDARDS CLOSED VENT SYSTEMS AND CONTROL DEVICES - Closed-vent systems and control devices are monitored annually for leaks. Those greater than 500 ppmv above background are considered leaking. First effort at repair is within 15 days. Visual inspections are required quarterly
61.350	STANDARDS DELAY OF REPAIR - Delay of Repair is allowed if the repair is technically impossible without a partial or complete unit shutdown.
61.354	MONITORING OF OPERATIONS - NOTE:.see section B.2., Process Solutions is responsible to the extent of their control of the benzene treatment process. The permittee subject to the requirements in 61.349, shall calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the control device operation. For a carbon adsorption system that does not regenerate the carbon bed directly on site (e.g., a carbon canister), either the concentration level of the organic compounds or the concentration level of benzene in the exhaust vent stream from the carbon adsorption system shall be monitored on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated.
61.356(b)	RECORDKEEPING REQUIREMENTS - : Maintain records that identify each waste stream at the facility and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart. Maintain a list of exempt waste streams along with calculations and documentations.
61.356(c)	If transferring waste off-site to another facility for treatment in accordance with 61.342(f), then shall maintain documentation for each offsite waste shipment.
61.356(d) and (f)	Maintain engineering design documentation for all control equipment and the closed vent system and the design analysis of the carbon adsorption system. Information is retained for the life of the equipment.
61.356(g) and (h)	Maintain records of all visual inspections and the records for all tests of no detectable emissions required by 61.343 through 61.347 and 61.349, along with information regarding repairs.
61.356(i)	For each treatment process operated to comply with 61.348, maintain documentation that includes the startup and shutdown of the unit. There may be other applicable portions of 61.356(i)

	that apply to this emissions unit.
61.356(e)	The permittee using a treatment process or wastewater treatment system unit in accordance with 61.348 of this subpart shall maintain the records in 61.356(e)(1) through (4). The documentation shall be retained for the life of the unit
61.356(j)	Maintain documentation regarding the closed vent system and control device (carbon adsorbers); dates and times when breakthrough is measured, when carbon is replaced. Record times when the above is not operated as designed; startups and shutdown of the units.

(3) [40 CFR Part 60, subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY
The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, subpart VV, including the following sections:

60.482-1	Standards-General: Compliance is determined by review of records, reports, review of performance test results and inspections.
60.482-2	Standards-Pumps in Light Liquid Service: Pumps are checked visually on a weekly basis for indications of leaks. Monitored monthly with readings of 10,000 ppm or greater indicating a leak. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
60.482-3	Standards-Compressors: Each barrier fluid system (see 60.482-3(a)) shall be equipped with a sensor, checked daily or equipped with an audible alarm. If sensor indicates failure of the seal system, barrier system or both, a leak is detected. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
60.482-4	Standards-Pressure Relief Devices in Gas/Vapor Service: They shall be operated with no detectable emissions (<500 ppm above background). Within 5 days after a pressure release, the device must be remonitored. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
60.482-5	Standards-Sampling Connection Systems: each sampling connection system shall be equipped with a closed- purged, closed-loop or closed-vent system and shall comply with the requirements of 40.682-5(b). In situ sampling without purges

	areexempt from the above.
60.482-6	Standards-Open-Ended Valves or Lines: Open-ended valves or lines are to be equipped with cap, blind flange, plug or second valve.
60.482-7	Standards-Valves in Gas/Vapor Service in Light Liquid Service: Valves are monitored monthly to detect leaks (>10,000 ppm). First attempt at repair shall be made within 5 days and repaired no later than 15 days. If a leak is detected, the valve is monitored monthly until a leak is not detected for 2 successive months. See 60.482-7(f)-(h) for information regarding valves with no detectable emissions, unsafe-to-monitor or difficult-to-monitor valves.
60.482-8	Standards-Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Connectors: Evidence of a leak is found by visual, audible, olfactory or other detection methods. The equipment shall be monitored within 5 days using Method 21 for leaks (>10,000 ppm). First attempt at repair shall be made within 5 days and repaired no later than 15 days.
60.482-9	Standards-Delay of Repair: Delay of repair (DOR) of equipment with leaks is allowed if repair within 15 days is infeasible without a process shutdown. Repair shall then occur before the end of the next process unit shutdown. DOR is allowed if the equipment is isolated from the process and not in VOC service.
60.482-10	Standards-Closed Vent Systems and Control Devices: Vapor recovery stems shall have an efficiency of 95% or greater, or to an exit concentration of 20 ppmv; combustion devices shall have an efficiency of 95% or greater, or to an exit concentration of 20 ppmv, dry basis, corrected to 3% oxygen or provide a minimum residence time of 0.75 seconds at minimum temperature of 816ºC. Flares will comply with requirements of 60.18. Leaks (>500 ppmv above background) shall have a first attempt at repair made within 5 days and repaired no later than 15 days.
60.486	Recordkeeping Requirements: Records that identify all equipment subject to this subpart along with records of the all monitoring performed along with the leaks and repair information. Keep design requirements for closed vent systems and control devices. Keep separate lists of those pieces of equipment designated for no detectable emissions, unsafe to monitor and difficult to monitor.

(4) TOXIC AIR CONTAMINANT STATUTE

The permit to install (PTI) application for this emissions unit, P001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 'X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: Hexane

   TLV (mg/m^3): 1762

Maximum Hourly Emission Rate (lbs/hr): 0.27

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 250

MAGLC (ug/m^3): 42 x 10^3

The permittee, has demonstrated that emissions of Hexane, from emissions unit(s) P001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

e) Reporting Requirements

(1) [63.642(f) and 63.654] REPORTING REQUIREMENTS - 40 CFR Part 63, Subpart CC
The permittee shall submit semiannual reports and such other notifications and reports as are required pursuant to 40 CFR 63, subpart CC, including the following sections:

63.642(f)	All reports required under this subpart shall be sent to the Administrator at the addresses listed in 40 CFR 63.13 of subpart A. If acceptable to both the Administrator and the permittee of a source, reports may be submitted on electronic media.

63.654(a)	Submit the reports as required for Group 1 wastewater streams that comply with the requirements of 40 CFR 61.340 through 61.355 of subpart FF.
63.654(e)	Submit the reports described in 63.654(h)
63.654(d)	Submit reports as required by 40 CFR 60.487 of subpart VV for equipment leaks.
63.654(h)	Reports of startup, shutdown, and malfunction required by 40 CFR Part 63.10(d)(5). Records and reports of startup, shutdown, and malfunction are not required if they pertain solely to Group 2 emission points, as defined in 40 CFR Part 63.641.

(2) [61.357] REPORTING REQUIREMENTS - 40 CFR Part 61, Subpart FF
NOTE: Currently, the Toledo Refining Company submits the Total Annual Benzene (TAB) report for all wastewater streams on the refinery property, including those streams associated with Process Solutions.

The permittee shall submit semiannual reports and such other notifications and reports as required by 40 CFR 61, subpart FF, including the following sections:

61.357(d)(2)	(d)(2) Submit annually a report that updates the waste stream characteristics based on the information submitted as an initial notification in 61.357(a). NOTE: Toledo Refining Company submits this annual report (TAB).
61.357(d)(6)	Submit quarterly a report that the equipment necessary to comply with these standards has been certified in accordance with 61.357(d)(1) and that the required inspections were carried out.
61.357(d)(7)(iv)(I)	Submit a report quarterly to the Administrator that includes each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified in 61.354(c) of this subpart. NOTE: The regulation cites 61.354(c), but it should be referencing 61.354(d) for carbon in carbon adsorber systems not regenerated on site.
61.357(d)(8)	Submit annually a report that summarizes all inspections required by 61.342 through 61.354 during which detectable emissions are measured or a problem that resulted in benzene emissions is identified, including information about the repairs and corrective actions.

(3) [60.487] REPORTING REQUIREMENTS - 40 CFR Part 60, Subpart VV
The permittee shall submit semiannual reports and such other notifications and reports as are required pursuant to 40 CFR 60, subpart VV, per the following sections:

60.487	Submit semiannual reports that includes the content of 60.487(c).

(4) TOXIC AIR CONTAMINANT STATUTE REPORTING
The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

f) Testing Requirements

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

a. Emission Limitation:

0.55 lb/hr VOC

Applicable Compliance Method:

Compliance with this emission limit shall be determined using the procedures for determining the emissions from the outlet of the control device identified under 40 CFR Part 61.355(i) and calculating the emissions for the roll-off box using equations 2, 9 and 23 from AP-42, section 4.3 (9/91).

b. Emission Limitation:

2.42 tons/yr VOC

Applicable Compliance Method:

The annual emission limitation was based on the hourly emission limitation for 8760 hours per year. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

[OAC rule 3745-31-05, OAC rule 3745-77-07(A)(1) and PTI 04-01341]

(2) [63.642(d)] GENERAL STANDARDS - 40 CFR Part 63, Subpart CC
Initial compliance determinations shall be required only as specified in this subpart. Compliance determinations shall be conducted according to the schedule and procedures specified in this subpart.

a. [63.642(d)(1)]
Performance tests and compliance determinations shall be conducted according to the schedule and procedures specified in this subpart.

b. [63.642(d)(2)]
The permittee shall notify the Administrator of the intention to conduct a performance test at least 30 days before the performance test is scheduled.

c. [63.642(d)(3)]
Performance tests shall be conducted according to the provisions of 40 CFR Part 63.7(e) except that performance tests shall be conducted at maximum representative operating capacity for the process. During the performance test, an owner or operator shall operate the control device at either maximum or minimum representative operating conditions for monitored control device parameters, whichever results in lower emission reduction.

d. [63.642(d)(4)]
Data shall be reduced in accordance with the EPA-approved methods specified in the applicable section or, if other test methods are used, the data and methods shall be validated according to the protocol in Method 301 of Appendix A of 40 CFR Part 63.

(3) [40 CFR 61, subpart FF] TEST METHODS, PROCEDURES AND COMPLIANCE PROVISIONS
The permittee shall comply with the applicable testing requirements required under 40 CFR 61, subpart FF, including the following sections:

61.355(a), (b) and (c)	Use the procedure in 61.355(b) to determine the annual waste quantity for each waste stream. Use the procedure in 61.355(c) to determine the flow-weighted annual average benzene concentration of each waste stream. Calculate the annual benzene quantity for each waste stream as stated in 61.355(a)(1)(iii).
61.355(h)	The permittee shall test equipment for compliance with no detectable emissions as required in 40 CFR Part 61.343 through 61.347 and 61.349 by using Method 21 of Appendix A.

(4) [60.485] TEST METHODS AND PROCEDURES - 40 CFR Part 60, Subpart VV (Equipment Leaks)
The permittee shall comply with the applicable testing requirements required under 40 CFR Part 60, subpart VV, including the following sections:

60.485(a)	For tests, use the reference methods and procedures in Appendix A of this part.
60.485(b)	To determine compliance with the standards in 60.482, 60.483, and 60.484 by using Method 21.
60.485(c)	Determining compliance with the no detectable emission standards in 60.482-2(e), 60.482-3(i), 60.482-4, 60.482-7(f) and 60.482-10(e).
60.485(d)	Methods used to test each piece of equipment to demonstrates that the VOC content would never be reasonably expected to exceed 10 percent by weight.
60.485(e)	How to demonstrate that equipment is in light liquid service.

g) Miscellaneous Requirements

(1) None.