



5/14/2015

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0302020012  
 Permit Number: P0118574  
 Permit Type: Administrative Modification  
 County: Allen

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| No  | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| Yes | CEMS                               |
| Yes | MACT/GACT                          |
| Yes | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MAJOR NON-ATTAINMENT               |
| No  | MODELING SUBMITTED                 |
| No  | MAJOR GHG                          |
| No  | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very 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 PTI 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](http://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](http://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](http://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, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



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

Cc: U.S. EPA  
Ohio EPA-NWDO; Indiana



**FINAL**

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

|                |                             |
|----------------|-----------------------------|
| Facility ID:   | 0302020012                  |
| Permit Number: | P0118574                    |
| Permit Type:   | Administrative Modification |
| Issued:        | 5/14/2015                   |
| Effective:     | 5/14/2015                   |





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

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**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:** 5/14/2015

## Authorization

Facility ID: 0302020012  
Facility Description: Petroleum Refinery and Storage  
Application Number(s): A0052969  
Permit Number: P0118574  
Permit Description: Administrative modification to address the applicability of NSPS Subpart Ja for ultraforming process (emissions unit B006).  
Permit Type: Administrative Modification  
Permit Fee: \$1,875.00  
Issue Date: 5/14/2015  
Effective Date: 5/14/2015

This document constitutes issuance to:

Lima Refining Company  
1150 South Metcalf Street  
Lima, OH 45804

of a Permit-to-Install for the emissions unit(s) identified on the following page.

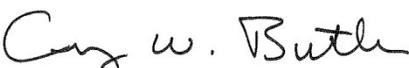
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:**5/14/2015

## Authorization (continued)

Permit Number: P0118574  
Permit Description: Administrative modification to address the applicability of NSPS Subpart Ja for ultraforming process (emissions unit B006).

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

|                                   |  |
|-----------------------------------|--|
| <b>Emissions Unit ID:</b>         | <b>B006</b>  |
| Company Equipment ID:             | UltraFormer Pre-Process Heaters 1, 2, & 3 (PR 175156-175159) |
| Superseded Permit Number:         | P0116161   |
| General Permit Category and Type: | Not Applicable   |



**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:**5/14/2015

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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.



**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:** 5/14/2015

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:**5/14/2015

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.



**Final Permit-to-Install**  
Lima Refining Company  
**Permit Number:** P0118574  
**Facility ID:** 0302020012  
**Effective Date:**5/14/2015

## **C. Emissions Unit Terms and Conditions**



**1. B006, UltraFormerProcess Preheater,,Reheater 1, Reheater 2, Reheater 3 (PR 175156-175159)**

**Operations, Property and/or Equipment Description:**

Refinery Fuel Gas or natural gas fired 822 mmBtu/hrU/F PRE, 1, 2,& 3 Heater (PR 175156-175159)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements   | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-17-10(B)(1)   | 0.020 lb of particulate emissions (PE) per million Btu of actual heat input   |
| b. | OAC rule 3745-18-08(C)(1)   | 0.15 lb of sulfur dioxide (SO <sub>2</sub> ) per million Btu of actual heat input [See b)(2)e.]   |
| c. | OAC rule 3745-17-07(A)  | Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.  |
| d. | 40 CFR, Part 63, Subpart DDDDD (40 CFR 63.7480-7575)<br><br>[In accordance with 63.7575, this emissions unit is in the 'unit designed to fire Gas 1 fuels' subcategory existing process heater located at a major source of HAP emissions and subject to the applicable emissions limitations/ control requirements specified in this section.] | See b)(2)a., and c)(2) through c)(5)<br><br>63.7500(a) Table 3 requirements   |
| e. | 40 CFR 63.1 through 63.15   | Table 10 to 40 CFR, Part 63, Subpart DDDDD – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply. |
| f. | 40 CFR, Part 60, Subpart J & Ja   | See b)(2)b. through b)(2)d.   |
| g. | 40 CFR, Part 60, Subpart A  | See 40 CFR 60.1 through 60.19   |
| h. | OAC rule 3745-31-05(D)  | B006 - 0.008 lb NO <sub>x</sub> /million Btu of actual  |



|  | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures                        |
|--|-------------------------------|--|
|  |                               | heat input based upon a 365-day rolling block average<br><br>See b)(2)d. |

(2) Additional Terms and Conditions

a. This emissions unit is subject to the initial notification requirements of 40 CFR, Part 63, Subpart DDDDD (Boiler MACT) as outlined in 63.9(b) (i.e., it is not subject to the emission limits, performance testing, monitoring, or site-specific monitoring plan requirements of Subpart DDDDD or any other requirements in 40 CFR, Part 63, Subpart A).

b. This permit action addresses a project which will allow for the replacement of radiant furnace modules, tubes, and headers. The replacement activities result in “reconstruction” and as such the process heaters become affected facilities (fuel gas combustion devices) applicable to 40 CFR, Part 60 – Subpart Ja.

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

c. The requirements of 40 CFR, Part 60 - Subpart Ja are equivalent to and/or more stringent than the requirements of 40 CFR, Part 60 - Subpart J. Therefore, the requirements of 40 CFR, Part 60, Subpart J will not be listed in this permit modification. This emissions unit is an affected fuel gas combustion device, pursuant to the definition in 40 CFR 60.101a and is therefore subject to the emissions limitations in 40 CFR 60.102a. Pursuant to 40 CFR 60.102a(g)(1)(ii), the permittee has elected to comply with the SO<sub>2</sub> emissions limitations in this rule by monitoring the refinery fuel gas quality with a hydrogen sulfide (H<sub>2</sub>S) continuous emissions monitor.

Therefore, the permittee shall not burn in this emissions unit any refinery fuel gas that contains H<sub>2</sub>S in excess of 162 parts per million by volume (ppmv) determined hourly on a 3-hour rolling average basis and H<sub>2</sub>S in excess of 60 ppmv determined daily on a 365 successive calendar day rolling average basis. This H<sub>2</sub>S standard in 40 CFR 60.102a(g)(1)(ii) is also applicable if the permittee combines and combusts natural gas in any proportion with refinery fuel gas in this emissions unit, according to the fuel gas definition in 40 CFR 60.101a.

d. Since this emissions unit has a rated capacity of greater than 40 million Btu per hour, it is subject to the NO<sub>x</sub> emission limitation in 40 CFR 60.102a(g)(2). The 0.040 lb NO<sub>x</sub>/million Btu HHV basis is determined daily on a 30-day rolling average basis. It is also subject to the limitation of 0.008 lb NO<sub>x</sub>/million Btu of



actual heat input based on a 365-day rolling block average established pursuant to OAC rule 3745-31-05(D).

- e. The SO<sub>2</sub> emissions limitation established in OAC rule 3745-18-08(C)(5) is less stringent than the hydrogen sulfide (H<sub>2</sub>S) concentration 162 ppmv established by Subpart Ja, 40 CFR 60.102a(g)(1)(ii). Therefore, compliance with the SO<sub>2</sub> limit is ensured by compliance with the H<sub>2</sub>S limit.
- f. The NO<sub>x</sub> emissions limitation is established pursuant to requirements in the federal consent decree addendum, civil action No. SA07CA0683RF, which became effective on 11/20/07. Pursuant to paragraph No. 17 of the consent decree addendum, emissions unit B006 is one of the four emissions units (B002, B003, B006 and B008) chosen by the company for installation of NO<sub>x</sub> control equipment. Selective catalytic reduction was installed on B002, B003 and B006 on December 17, 2011 to meet this requirement.

As required by the consent decree addendum, the NO<sub>x</sub> emissions limitation is established to reflect the final voluntary limits to meet a system-wide average NO<sub>x</sub> performance level of 0.044 lb per million Btu.

- g. The purpose of this permit is to address the emissions unit's reconstruction under applicable rules promulgated by the administrator under Section 112 of the Clean Air Act pursuant to OAC rule 3745-31-01(SSS)(1)(a)(iv) [See g)(1) below].

c) Operational Restrictions

- (1) The permittee shall burn only refinery fuel gas or natural gas in this emissions unit. The sulfur content of the refinery fuel gas or natural gas burned in this emissions unit shall comply with the allowable SO<sub>2</sub> emission limitation specified in section b)(1)f.
- (2) A process heater or boiler in the Gas 1 subcategory with heat input capacity of 10 million Btu per hour or greater shall conduct an annual tune-up of the boiler or process heater as specified in 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(vi). This tune-up frequency does not apply to limited-use boilers and process heaters, as defined in 63.7575, or units with continuous oxygen trim systems that maintain an optimum air to fuel ratio.
- (3) A process heater or boiler in the Gas 1 subcategory that has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or meets the definition of limited-use boiler or process heater in 40 CFR 63.7575, shall conduct a tune-up of the boiler or process heater every 5 years as specified in 40 CFR 63.7540(a)(10)(i) through (vi) to demonstrate continuous compliance. You may delay the burner inspection specified in 40 CFR 63.7540(a)(10)(i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.
- (4) Pursuant to 40 CFR 63.7540(a)(13), if the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- (5) The permittee shall have a one-time energy assessment performed by a qualified energy assessor, pursuant to work practice standards 4.a through 4.h in Table 3 of 40 CFR,



Part 63, Subpart DDDDD. The subsequent report associated with this assessment shall be submitted no later than January 31, 2016.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than refinery fuel gas or natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) In order to demonstrate compliance with the emission limitation of 162 ppmv of H<sub>2</sub>S in the refinery fuel gas [and if applicable, combined fuel firing as noted in b)(2)c. above], the permittee shall operate and maintain an instrument for continuously monitoring and recording the concentration (dry basis) of H<sub>2</sub>S in the refinery fuel gas or combined fuel stream before being burned in this emissions unit. The monitoring shall be conducted in accordance with 40 CFR 60.107a, as follows:
  - a. The span value for this instrument is 300 ppmv of H<sub>2</sub>S.
  - b. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H<sub>2</sub>S in the fuel gas being burned.
  - c. The performance evaluations for this H<sub>2</sub>S monitor under 40 CFR 60.13(c) shall use Performance Specification 7 of 40 CFR, Part 60, Appendix B. The permittee shall conduct a relative accuracy test audit (RATA) for the H<sub>2</sub>S continuous emission monitoring equipment per d)(5) below using Method 15 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods shall be used for conducting the RATAs.
- (3) A statement of certification of the existing H<sub>2</sub>S continuous emission monitoring system (CEMS) shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 7. Proof of certification shall be made available to representatives of the Ohio EPA, Northwest District Office upon request.
- (4) The permittee shall operate and maintain existing equipment to continuously monitor and record H<sub>2</sub>S from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

The permittee shall maintain records of all data obtained by the H<sub>2</sub>S CEMS including, but not limited to, parts per million of H<sub>2</sub>S for each cycle time of the analyzer, with no resolution less than one data point per minute required, emissions of H<sub>2</sub>S in units of the applicable standard (grain/dscf and parts per million by volume) as a rolling, 3-hour average, the results of daily zero/span calibration checks, and the magnitudes of manual calibration adjustments.



- (5) The permittee shall maintain a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of H<sub>2</sub>S. The plan shall follow the requirements of 40 CFR, Part 60, Appendix F.

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

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

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

- a. Conduct a relative accuracy test audit of the H<sub>2</sub>S CEM at a minimum frequency of once every three years; and
  - b. Conduct cylinder gas audits on the H<sub>2</sub>S CEM during each quarter when a relative accuracy test audit is not conducted.
- (6) The permittee shall conduct a root cause analysis and a corrective action analysis for a fuel gas combustion device, each exceedance of an applicable short-term emissions limit in §60.102a(g)(1) if the SO<sub>2</sub> discharge to the atmosphere is 227 kg (500 lb) greater than the amount that would have been emitted if the emissions limits had been met during one or more consecutive periods of excess emissions or any 24-hour period, whichever is shorter.
- (7) A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a discharge meeting one of the conditions specified in d)(6).
- (8) The permittee shall implement the corrective action(s) identified in the corrective action analysis conducted pursuant to 40 CFR 60.103a(d) in accordance with the applicable requirements in 40 CFR 60.103a paragraphs (e)(1) through (3).
- a. All corrective action(s) must be implemented within 45 days of the discharge for which the root cause and corrective action analyses were required or as soon thereafter as practicable. If the permittee concludes that corrective action should not be conducted, the permittee shall record and explain the basis for that conclusion no later than 45 days following the discharge as specified in 40 CFR 60.108a(c)(6)(ix);
  - b. For corrective actions that cannot be fully implemented within 45 days following the discharge for which the root cause and corrective action analyses were required, the permittee shall develop an implementation schedule to complete the corrective action(s) as soon as practicable; and
  - c. No later than 45 days following the discharge for which a root cause and corrective action analyses were required, the permittee shall record the



corrective action(s) completed to date, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates as specified in §60.108a(c)(6)(x).

- (9) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit, in units of parts per million by volume, on a dry basis. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
  - b. emissions of NO<sub>x</sub> in all units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(9)g. and d)(9)h.
- (10) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO<sub>x</sub> monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 2. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

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



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

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

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

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

- a. Conduct a relative test audit of the NOx CEM at a minimum frequency of once every three years; and
  - b. Conduct cylinder gas audits on the NOx CEM during each quarter when a relative accuracy test audit is not conducted.
- (12) The permittee shall install, operate and maintain equipment to continuously monitor and record oxygen (O<sub>2</sub>) emitted from these emissions units, in units of percent O<sub>2</sub>. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.

The permittee shall maintain records of data obtained by the continuous O<sub>2</sub> monitoring system including, but not limited to:

- a. percent O<sub>2</sub> for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. results of quarterly cylinder gas audits;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s);
- e. hours of operation of the emissions unit, continuous O<sub>2</sub> monitoring system;
- f. the date, time, and hours of operation of the emissions unit without the continuous O<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous O<sub>2</sub> monitoring system; as well as,
- h. the reason (if known) and the corrective actions taken (if any) for each such event in d)(12)f. and d)(12)g.



- (13) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous O<sub>2</sub> monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 3. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

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

- (14) The permittee shall maintain a written quality assurance/quality control plan for the continuous O<sub>2</sub> monitoring system designed to ensure continuous valid and representative readings of O<sub>2</sub> emissions in units of the applicable standard(s).

The plan shall follow the requirements of 40 CFR, Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous O<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

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

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

- a. Conduct a relative accuracy test audit of the O<sub>2</sub> CEM at a minimum frequency of once every three years; and
  - b. Conduct cylinder gas audits on the O<sub>2</sub> CEM during each quarter when a relative accuracy test audit is not conducted.
- (15) Pursuant to the approval letter from U.S. EPA dated July 28, 2010, the permittee shall install and operate monitoring equipment in the selective catalytic reduction bypass stack to continuously monitor the temperature and draft pressure in the selective catalytic reduction bypass stack, subject to the following condition:
- a. The permittee must measure, report and comply with the temperature and pressure readings obtained in the bypass stack during normal operation as measured when stack testing the main stack to demonstrate initial compliance with applicable limits (i.e. – ambient temperature and a slight negative pressure in the bypass stack when the selective catalytic reduction induced draft fan is operating). The temperature and pressure readings are hereby incorporated into this permit as a means to assure compliance.



e) Reporting Requirements

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

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

- (3) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) on a quarterly basis, in writing, of all H<sub>2</sub>S in excess of 162 ppmv determined hourly on a 3-hour rolling average basis and H<sub>2</sub>S in excess of 60 ppmv determined daily on a 365 successive calendar day rolling average basis

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

- (4) If there are no concentrations of H<sub>2</sub>S in the refinery fuel gas (or combined fuel stream, if applicable) greater than 162 ppmv during the calendar quarter, then the permittee shall submit a statement to that effect along with the emissions unit and monitor operating times. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during previous calendar quarters.
- (5) The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any NO<sub>x</sub> CEMS downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions.

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

- (6) The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any O<sub>2</sub> CEMS downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions.



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

- (7) The permittee shall include in its quarterly excess emission reports each period of time when the selective catalytic reduction bypass dampers are not 100 percent closed, the reason why they were not 100 percent closed and the actions taken to prevent such occurrence from happening again.
  - (8) The permittee shall submit an excess emissions report for all periods of excess emissions according to the requirements of §60.7(c) except that the report shall contain the information specified in paragraphs (d)(8)(a) through (8)(g) below.
    - a. The date that the exceedance occurred;
    - b. An explanation of the exceedance;
    - c. Whether the exceedance was concurrent with a startup, shutdown, or malfunction of an affected facility or control system; and
    - d. A description of the action taken, if any.
    - e. The information described in 40 CFR 60.108a(c)(6)(i) through (xi) for all discharges listed in 40 CFR 60.108a(c)(6).
    - f. For any periods for which monitoring data are not available, any changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability.
    - g. A written statement, signed by a responsible official, certifying the accuracy and completeness of the information contained in the report.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
0.020 lb of PE per million Btu of actual heat input  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly refinery fuel gas or natural gas combustion rate, in million standard cubic feet per hour, by the appropriate particulate emission factor, in lb(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the process heater. If required, the



permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the methods and procedures specified in Methods 1 through 4, and 5 of 40 CFR, Part 60, Appendix A, and the requirements specified in OAC rule 3745-17-03(B)(9).

b. Emission Limitation:

0.15 lb of SO<sub>2</sub> per million Btu of actual heat input

Applicable Compliance Method:

This limit is less stringent than firing refinery fuel gas (or combined fuel stream, if applicable) with a maximum H<sub>2</sub>S content of 230 mg/dscm (0.10 grain/dscf) in this emissions unit. As long as the permittee maintains compliance with the H<sub>2</sub>S operational restriction in section 1.b)(2)c., compliance with the SO<sub>2</sub> limitation will be assumed. If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 through 4, and 6 and the requirements specified in OAC rule 3745-18-04(E)(1).

c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitation:

Refinery fuel gas that contains H<sub>2</sub>S in excess of 162 parts per million by volume (ppmv) determined hourly on a 3-hour rolling average basis and H<sub>2</sub>S in excess of 60 ppmv determined daily on a 365 successive calendar day rolling average basis in the refinery fuel gas, or combined fuel stream if applicable.

Applicable Compliance Method:

Compliance shall be based upon the monitoring and record keeping requirements specified in sections d)(2) through d)(8) for this emissions unit. If required, the permittee shall determine compliance with the H<sub>2</sub>S emission limitation by using Method 15 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods.

e. Emission Limitations:

0.008 lb NO<sub>x</sub>/million Btu of actual heat input based upon a 365-day block average



Applicable Compliance Method:

Compliance shall be based upon the monitoring and record keeping requirements specified in sections d)(9) through d)(15) for this emissions unit. If required, the permittee shall determine compliance with the NO<sub>x</sub> emission limitation by using Methods 1 through 4, and 7 of 40 CFR, Part 60, Appendix A, or other approved U.S. EPA methods.

g) Miscellaneous Requirements

- (1) This permit action addresses a project which will allow for the replacement of radiant furnace modules, tubes, and headers. The furnace burners will be replaced decreasing the maximum heat input capacity of the burners from 843.4 million Btu/hour to 822 million Btu/hour.
  - a. The permittee has demonstrated that no major modification will occur under Prevention of Significant Deterioration (PSD) regulations as the "net emissions increase" was not triggered as a result of this project. This was achieved through a comparison of baseline actual emissions to potential emissions.
  - b. The permittee has demonstrated that the allowable emissions will not increase as a result of the reconstruction project. As such, the emission limitations will not be modified with this permitting action. Additionally, Best Available Technology is not applicable.