



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

12/10/2015

Bill Rupert  
BP-Husky Refining LLC  
4001 Cedar Point Road  
Oregon, OH 43616

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448020007  
Permit Number: P0119999  
Permit Type: Administrative Modification  
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	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 Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA  
TDES; Michigan; Indiana; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
BP-Husky Refining LLC**

Facility ID:	0448020007
Permit Number:	P0119999
Permit Type:	Administrative Modification
Issued:	12/10/2015
Effective:	12/10/2015





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
BP-Husky Refining LLC

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**Final Permit-to-Install**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

## Authorization

Facility ID: 0448020007  
Facility Description: Toledo Refinery  
Application Number(s): M0003730  
Permit Number: P0119999  
Permit Description: This administrative modification is to establish BAT for two emissions units (F005 & F006) that had a PTI during a period when no BAT was established for sources with less than 10 TPY in preparation for the Title V renewal.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 12/10/2015  
Effective Date: 12/10/2015

This document constitutes issuance to:

BP-Husky Refining LLC  
4001 Cedar Point Road  
P.O. Box 696  
Oregon, OH 43697

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

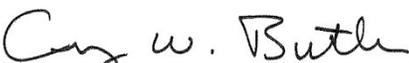
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

## Authorization (continued)

Permit Number: P0119999

Permit Description: This administrative modification is to establish BAT for two emissions units (F005 & F006) that had a PTI during a period when no BAT was established for sources with less than 10 TPY in preparation for the Title V renewal.

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>F005</b>
Company Equipment ID:	Coke Handling
Superseded Permit Number:	04-01471
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F006</b>
Company Equipment ID:	Coke Crushing
Superseded Permit Number:	04-01471
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

## **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 Toledo Department of Environmental Services.

- (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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 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.

## **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 Toledo 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 (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 Toledo Department of Environmental Services. 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**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

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



**Final Permit-to-Install**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

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**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

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

**1. F005, Coke Handling**

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

F005 - Coker 3 coke handling - petroleum coke from Coker 3 drops into the coke pit where coke is transferred to the coke crusher by a self-propelled crane with clamshell bucket. Crushed coke is transferred from the crusher to a conveyor owned and operated by a different facility.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) June 30, 2008	Compliance with the requirements of this rule includes compliance with the requirements established pursuant to OAC rule 3745-31-05(D).  See b)(2)a.
b.	OAC rule 3745-31-05(D)	Particulate matter less than or equal to 10 microns in diameter (PM <sub>10</sub> ) emissions shall not exceed 6.31 tons per rolling, 12-month period.  Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  The permittee shall maintain a partial enclosure on the coke pit.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1) and 3745-17-08(B).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)g.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.  See b)(2)f.
e.	OAC rule 34745-17-08(B)	See b)(2)b. through b)(2)e.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
  - coke transfer within pit and to crusher hopper by crane;
  - transfer coke from hopper to crusher;
  - crane travel in coke pit;
  - transfer coke from crusher to third party conveyor; and
  - conveying.
- c. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s), when in operation, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
Coke transfer within pit and to crusher hopper by crane	process inherently wet
Transfer coke from hopper to crusher	enclosure
Crane travel in coke pit	process inherently wet
Transfer coke from crusher to third party conveyor	partial enclosure
Conveying	partial enclosure

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. For each material handling operation that is not fully enclosed, additional control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the additional control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the additional control measure(s) is unnecessary.
  - e. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
  - f. It shall be deemed not to be a violation of this rule where the presence of uncombined water or steam is the only reason for failure of a fugitive dust emission to meet the requirements of this rule. [OAC rule 3745-17-07(B)(12)]
  - g. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
    - (1) None.
  - d) Monitoring and/or Recordkeeping Requirements
    - (1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform visual inspections of such operations, when in operation, in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>visual inspection frequency</u>
Coke transfer within pit and to crusher hopper by crane	Daily
Transfer coke from hopper to crusher	Daily
Crane travel in coke pit	Daily
Transfer coke from crusher to third party conveyor	Daily
Conveying	Daily

The above-mentioned visual inspections shall be performed during representative, normal operating conditions.

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

- (2) The permittee shall maintain records of the following information:
- a. The date and reason any required inspection was not performed;
  - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
  - c. The additional control measure(s) employed;
  - d. The dates the additional control measure(s) was (were) implemented; and
  - e. On a calendar quarter basis, the total number of days the additional control measure(s) was (were) implemented.

The information in section d)(2)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

- (3) The permittee shall maintain monthly records of the amount of coke handled. From this data, the permittee shall calculate and record the total PM<sub>10</sub> emissions for that month and the rolling, 12-month summation of the monthly emissions in accordance with the procedures specified in section f)(1)a.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports in accordance with the reporting requirements of the Standard Terms and Conditions of this permit that identify the following:
  - a. Each day during which an inspection was not performed by the required frequency; and
  - b. Each instance when an additional control measure, that was to be performed as a result of an inspection, was not implemented.
  - c. Each month that the PM<sub>10</sub> emissions exceeded 6.31 tons per rolling, 12-month period.

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

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

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. PM<sub>10</sub> emissions shall not exceed 6.31 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed based on the maximum capacity of Coker 3. Compliance with this emissions limitation shall be determined by calculating PM<sub>10</sub> emissions using the following emission factors along with the actual tons of coke handled.

Coke transfer within pit and to crusher hopper by crane: AP-42 5<sup>th</sup> Edition Chapter 13.2.4 for drop operations.

Transfer coke from hopper to crusher: AP-42 5<sup>th</sup> Edition, Chapter 13.2.4 for drop operations.

Crane travel in coke pit: AP-42 5<sup>th</sup> Edition, Chapter 13.2.2.

Transfer coke from crusher to third party conveyor: AP-42 5<sup>th</sup> Edition Chapter 13.2.4 for drop operations.

Conveying: AP-42 5<sup>th</sup> Edition, Chapter 13.2.4 for drop operations.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

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

g) Miscellaneous Requirements

(1) None.

**2. F006, Coke Crushing**

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

F006 - Coker 3 petroleum coke crusher

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 3745-31-05(A)(3) June 30, 2008	Compliance with the requirements of this rule includes compliance with the requirements established pursuant to OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-31-05(D)	Particulate (PE) emissions shall not exceed 2.52 tons per rolling, 12-month period.  reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  The permittee shall maintain a partial enclosure on the coke crusher.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1) and 3745-17-08(B).
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)g.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 34745-17-08(B)	See b)(2)b. through b)(2)e.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:  
  
Coke crusher
- c. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:  
  

<u>material handling operation(s)</u>	<u>control measure(s)</u>
Coke crusher	partial enclosure

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. For each material handling operation that is not fully enclosed, the additional control measure(s) or equipment maintenance shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the additional control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- e. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

f. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform visual inspections of such operations, when in operation, in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
Coke crushing	daily

The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

(2) The permittee shall maintain records of the following information:

- a. The date and reason any required inspection was not performed;
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s) and/or equipment maintenance;
- c. The equipment maintenance and/or additional control measure(s) employed;
- d. The dates the equipment maintenance and/or additional control measure(s) was (were) implemented; and
- e. On a calendar quarter basis, the total number of days the equipment maintenance or additional control measure(s) was (were) implemented.

The information in section d)(2)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

(3) The permittee shall maintain monthly records of the amount of coke crushed. From this data, the permittee shall calculate and record the total PE emissions for that month and the rolling, 12-month summation of the monthly emissions in accordance with the procedures specified in section f)(1)a.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports in accordance with the reporting requirements of the Standard Terms and Conditions of this permit that identify the following:
  - a. Each day during which an inspection was not performed by the required frequency; and
  - b. Each instance when an additional control measure, that was to be performed as a result of an inspection, was not implemented.
  - c. Each month that the PE emissions exceeded 2.52 tons per rolling, 12-month period.

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

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

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:

Particulate emissions shall not exceed 2.52 tons per rolling, 12-month period.

Applicable Compliance Method:

The allowable emissions rate was established based on the maximum coke production rate at Coker 3.

If required, the permittee shall demonstrate compliance using the particulate emission factor of 0.02 lb/ton from the Ohio EPA Reasonably Available Control Measures Guide dated August, 1983 along with the actual coke production and using an estimated control efficiency of 70% for a partial enclosure.

- b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



**Final Permit-to-Install**  
BP-Husky Refining LLC  
**Permit Number:** P0119999  
**Facility ID:** 0448020007  
**Effective Date:** 12/10/2015

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

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

- g) Miscellaneous Requirements
  - (1) None.