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Facility Name: **Commercial Ullman Lubricants Company**

Application Number: **13-3469**

Date: **February 18, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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 party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Commercial Ullman Lubricants Company** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
B001 Mod	5.2 MMBTU/ hour natural gas, No. 2 oil fired boiler modified to burn no. 4 oil	Use of natural gas no. 2 or no. 4 fuel oil ≤ 0.7 percent sulfur in fuel oil Visible emissions ≤ 20 percent opacity as a six minute average
B003 Mod	5.2 MMBTU/ hour natural gas No. 2 oil fired boiler modified to burn No. 4 fuel oil	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Visible emissions \leq 20 percent opacity as a six minute average		3745-17-07 (A)	(A)
		Applicable Federal & <u>OAC Rules</u>	3745-17-10	3745-17-10
		3745-31-05	3745-31-05	

The determined BAT for this source is the use of natural gas, No. 2 or No. 4 fuel oil \leq 0.7 percent sulfur in fuel oil

3745-17-07

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	TPY	2.48	pounds/hour SO ₂	
	0.50	10.9	TPY	
Permit Allowable Mass Emissions and/or Control/Usage Requirements	pound/hour NO _x	0.50	pound/hour NO _x	
	2.19 TPY	2.19	TPY	
	0.05	0.05	pound/hour PM	
	pound/hour PM	0.22	TPY	
	0.22 TPY			
		When burning No. 4 oil		
	When burning No. 4 oil	2.62	pounds/hour SO ₂	
	2.62	11.5	TPY	
	pounds/hour SO ₂	0.50	pound/hour NO _x	
	11.5 TPY	2.19	TPY	
20 percent opacity as six minute average	0.50	0.18	pound/hour PM	
	0.50	0.78	TPY	
	pound/hour NO _x		*	
	2.19 TPY			
	0.18			
	pound/hour PM		*	
	0.78 TPY			
When burning natural gas	*			
0.52	*			
pound/hour NO _x				
2.27	20 percent			
TPY	opacity as			
	six minute			
	average.			
When burning No. 2 oil	When burning natural gas			
2.48	0.52			
pounds/hour	pound/hour NO _x			
	2.27 TPY			
SO ₂	When burning			
10.9	No. 2 oil			

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- * This emission limit is equivalent to or less stringent than the limit established in OAC 3745-31-05.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
S0 ₂	23.0
NO _x	4.54
PM	1.56

CONSTRUCTION STATUS

The **Cleveland Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **B001 and B003 Mod (2) 5.2 MMBTU/hour natural gas, No. 2 oil fired boilers modified to burn No. 4 fuel oil.**

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be

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accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restriction

1. The permittee shall burn only natural gas, No.2 or No.4 fuel oil in this emissions unit.

B. Monitoring and Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, No.2 or No.4 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall perform weekly checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit when burning No.4 fuel oil. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

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- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any abnormal visible emission incident; and,
- e. any corrective actions taken to eliminate the abnormal visible emissions.

C. Reporting Requirement

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, No.2 or No.4 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Cleveland Air Pollution Control) by January 31 and July 31 of each year and shall cover the previous 6-month period.

D. Testing Requirements

1. Emission Limitation

20 percent opacity, as a six-minute average

Applicable Compliance Method(s)

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

2. Emission Limitation

0.52 lb/hr of NO_x 2.27 TPY when burning natural gas

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input capacity of the emissions unit(5.2 mmbtu/hr) by the AP-42 emission factor for NO_x (100 lbs NO_x/million cubic feet)and dividing by the heat content for natural gas (1 ft³/1000 btu).

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3. Emission Limitation

2.48 lbs/hr of SO₂ 10.9 TPY when burning No.2 fuel oil

Applicable Compliance Method

For the use of No.2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for SO₂ (142*S lb/1000 gal). S is equal to the percent weight of Sulfur in the fuel.

4. Emission Limitation

0.50 lb/hr of NO_x 2.19 TPY when burning No.2 fuel oil

Applicable Compliance Method

For the use of No.2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for NO_x(20 lb/1000 gal).

5. Emission Limitation

0.05 lb/hr of PM 0.22 TPY when burning No.2 fuel oil

Applicable Compliance Method

For the use of No.2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for PM(2 lbs/1000 gal).

6. Emission Limitation

2.62 lbs/hr of SO₂ 11.5 TPY when burning No.4 fuel oil

Applicable Compliance Method

For the use of No.4 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for SO₂[(150*S) lb/1000 gal]{S being the percent

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weight of sulfur in the oil}.

7. Emission Limitation

0.50 lb/hr of NO_x 2.19 TPY when burning No.4 fuel oil

Applicable Compliance Method

For the use of No.4 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for NO_x (20 lbs/1000 gal).

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8. Emission Limitation

0.18 lb/hr of PM/PM₁₀ 0.78 TPY when burning No.4 fuel oil

Applicable Compliance Method

For the use of No.4 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (25 gal/hr) by the AP-42 emission factor for PM(7 lbs/1000 gal).