



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

9/24/2008

Certified Mail

JOHN STATON
Clean Water Ltd.
300 Cherokee Dr.
DAYTON, OH 45427

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0857751312
Permit Number: 08-04938
Permit Type: Initial Installation
County: Montgomery

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA
RAPCA; Indiana; Kentucky

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Clean Water Ltd.

Issue Date: 9/24/2008

Permit Number: 08-04938

Permit Type: Initial Installation

Permit Description: Oil/Water separators, Organic/Water separator, Transfer systems, Tanks and Containers
for off-site waste recovery facility.

Facility ID: 0857751312

Facility Location: Clean Water Ltd.
300 Cherokee Drive,
Dayton, OH 45427

Facility Description: Waste Treatment and Disposal

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Dale Davidson at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

MACT & NSPS

2. Source Description:

The Consent Decree specifies 101 different sources/devices for which the facility was required to submit a PTI application, one of which was the RTO control equipment. Under Ohio EPA rules control equipment is not defined as an emissions source and not permitted. Therefore, that equipment is not included as an emissions unit in this PTI, but, has been specified as the required control device for many of those units which are controlled. Two of the remaining 100 sources (P008 - rotary vacuum drum filter and P009 - rotary vacuum sludge vat) have not yet been installed. Although this equipment is located at the facility, Clean Water currently has no plans to operate them anytime in the near future. Therefore, P008 and P009 were not included in this PTI. Clean Water will submit a PTI application for these in the future if and when they have plans to start operation of them. Emissions unit P038 (Building B Wastewater Treatment Filter Cake Roll-off Container, 20-yd³) was not required by the Consent Decree to have a PTI application. Originally, Clean Water intended to conduct analyses on samples from the roll off to demonstrate it would be exempt from Subpart DD. Clean Water decided it would be easier to assume it was an affected source (i.e., a container) and implement the appropriate controls as dictated by Subpart DD. A request was made by Clean Water to amend their application to include this source in this PTI. With this unit added, there are a total of 99 emissions units under this PTI 08-04938. The 99 emissions units are separated into six different emissions units groups in the PTI. Each emissions unit group name reflects an "off-site material management unit" category as defined in Subpart DD (i.e., Containers, Level 1; Containers, Level 2; Oil/Water Separators; Tanks, Level 1; Tanks, Level 2; and Transfer Systems). Subpart DD specifies standards that apply to each of these affected source categories.

3. Facility Emissions and Attainment Status:

Clean Waters Limited (CWL) is located in the city of Dayton in Montgomery County, which is currently classified as basic attainment for ozone. CWL submitted PTI applications for 101 sources (including a RTO) to partially satisfy requirements of the Consent Decree (Civil Action No. 3:04 CV 00418) entered and filed on 2/12/2008, in the United States District Court for Southern District of Ohio Western Division. The Consent Decree was settlement of a civil action brought against them by private citizen and USEPA. In the lawsuit, USEPA alleged that Perma-Fix of Dayton, Inc. (now owned by and operated under Clean Water Ltd.) is a major source of hazardous air pollutants that must comply with specified requirements under the Clean Air Act.

4. Source Emissions:

The basis of compliance will be meeting the Subpart DD standards, and for those emissions units controlled by the closed-vent system and RTO, destroying the total OC (less methane and ethane) or total HAP emissions by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: 08-04938
Facility ID: 0857751312

5. Conclusion:

RAPCA's history with the facility dates back several years during which there was disagreement on whether or not the facility was a major source of HAP emissions and subject to MACT and TV permitting requirements. USEPA became involved with the lawsuit against the facility and the resulting settlement is outlined in the Consent Decree. Through the Consent Decree, Clean Water agreed to submit a PTI application for the unpermitted sources, submit an application for and operate under a Title V permit, and comply with 40 C.F.R. Part 63, Subpart DD - OSWRO MACT. However, the CD does not specify an agreement on what the HAPs PTE is for the facility. The facility maintains the HAP PTE for the facility is substantially below the 25 ton/year of combined HAPs and 10 ton/year of single HAP that must be exceeded before a facility becomes a major source of HAPs. The facility provided two studies with the PTI application that estimated the HAP PTE using a complex mix of modeling programs (e.g., WATER9 and Tanks), and data from other studies and modeling done for similar facilities. Due to the nature of the process operations, it is impossible to determine individual emissions rates for most of the emissions units. These studies project the maximum facility wide total HAP PTE to be 16.5 tons/year and the highest single HAP PTE at 5.3 tons/year.

6. Please provide additional notes or comments as necessary:

All the emissions units contained in this permit are subject to MACT 40 CFR Part 63, Subpart DD -National Emissions Standards for Hazardous Air Pollutants from OSWRO. In addition, Subpart DD cross-references the following subparts in Part 63 which apply to specific categories of Subpart DD affected sources: Subpart OO - National Emission Standards for Tanks - Level 1; Subpart PP - National Emission Standards for Containers; Subpart QQ - National Emission Standards for Surface Impoundments; Subpart RR - National Emission Standards for Individual Drain Systems; and Subpart VV - National Emission Standards for Oil-Water Separators and Organic-Water Separators. All the emissions units contained in this permit are subject to BAT requirements of OAC rule 3745-31-05(A)(3), the limitations of OAC rule 3745-21-07(G), and the Consent Decree noted above. OAC rule 3745-21-07(G) is less stringent than the requirements of MACT Subpart DD. The following emissions units are, based on their capacity, potentially subject to the NSPS 40 CFR Part 60, Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984: T045, T052, T060, T061, and T062 listed in the Emissions Unit Group named Tanks, Level 1; and T063, T066, T079, T081, T082, T088, T089, T090, T091, T092, T093, T096, T097, T099, T100, T106, and T107 listed in the Emissions Unit Group named Tanks, Level 2. Therefore, in accordance with Subpart Kb, recordkeeping of the dimensions and analyses showing the capacities of the storage vessels have been specified for these emissions units.



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install
for
Clean Water Ltd.**

Facility ID: 0857751312
Permit Number: 08-04938
Permit Type: Initial Installation
Issued: 9/24/2008
Effective: To be entered upon final issuance



Air Pollution Permit-to-Install
for
Clean Water Ltd.

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 2. Emissions Unit Group - Containers, Level 2: P030, P031, P032, P033, P034, P035, P036, P037, P038 25

 3. Emissions Unit Group - Oil/Water Separators: P002, P003, P004, P005, P006, P007. Each unit has fixed roof vented through closed-vent system to a RTO control device. 28

 4. Emissions Unit Group - Tanks, Level 1: T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T061, T062 37

 5. Emissions Unit Group - Tanks, Level 2: T063, T064, T065, T066, T067, T068, T069, T070, T071, T072, T073, T074, T075, T076, T077, T078, T079, T080, T081, T082, T083, T084, T085, T086, T087, 37



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T088, T089, T090, T091, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T103, T104, T105, T106, T107. Each unit is vented through a closed-vent system to a RTO control device. 41

- 6. Emissions Unit Group - Transfer Systems: P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028. Each unit uses continuous hard-piping..... 52



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04938

Facility ID: 0857751312

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0857751312

Facility Description: off site waste and recovery operations

Application Number(s): A0008562

Permit Number: 08-04938

Permit Description: Oil/Water separators, Organic/Water separator, Transfer systems, Tanks and Containers for off-site waste recovery facility.

Permit Type: Initial Installation

Permit Fee: \$33,050.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/24/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Clean Water Ltd.
300 Cherokee Drive
Dayton, OH 45427

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

Chris Korleski
Director



Authorization (continued)

Permit Number: 08-04938
Permit Description: Oil/Water separators, Organic/Water separator, Transfer systems, Tanks and Containers for off-site waste recovery facility.

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

Group Name: Containers, Level 1

Emissions Unit ID:	P029
Company Equipment ID:	drum bulking, hazardous waste containers 0.1 to 0.46 m3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Containers, Level 2

Emissions Unit ID:	P030
Company Equipment ID:	tricanter solids receiving drum (drum -006)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	sweco-02 solids receiving drum (drum-005)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	evaporator bottoms tote (tote-203)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	condensate light ends receiver tote (tote-205)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P034
Company Equipment ID:	drum bulking, hazardous waste containers > 0.46 m3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	drum bulking, hazardous waste tanker trucks
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	drum bulking, hazardous waste tanker trucks
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	sweco-01 solids receiving drum (drum-007)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Oil/Water Separators

Emissions Unit ID:	P002
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Company Equipment ID:	oil/water separator (T-402)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	tricanter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	centrifuge 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	centrifuge 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	sweco-01 (sweco vibratory screen)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	sweco-02 (sweco vibratory screen)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Organic/Water Separators

Emissions Unit ID:	P008
Company Equipment ID:	rotary vacuum drum filter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	rotary vacuum sludge vat
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Tanks, Level 1

Emissions Unit ID:	T044
Company Equipment ID:	S-71 (oily wastewater storage tank, 5,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T045
Company Equipment ID:	T-706B (bioplant equalization feed tank, 185,392 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T046
Company Equipment ID:	S-1 (process oils storage tank, 16,700 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T047
Company Equipment ID:	S-2 (process oils storage tank, 15,700 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T048
Company Equipment ID:	S-3 (process oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	T049
Company Equipment ID:	S-4 (cut oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T050
Company Equipment ID:	S-6 (raw oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T051
Company Equipment ID:	S-7 (raw oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T052
Company Equipment ID:	S-13 (process oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T053
Company Equipment ID:	S-14 (storage tank, 20,300 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T054
Company Equipment ID:	S-21 (storage tank, 16,700 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T055
Company Equipment ID:	S-22 (crank case oils storage tank, 17,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T056
Company Equipment ID:	S-23 (crank case oils storage tank, 18,350 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T057
Company Equipment ID:	S-24 (crank case oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T058
Company Equipment ID:	S-28 (crank case oils storage tank, 14,400 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T059
Company Equipment ID:	W-4 (raw oil solids storage tank, 19,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T060
Company Equipment ID:	T609A (processed oil storage tank, 187,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T061
Company Equipment ID:	T-609B (processed oil storage tank, 187,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T062
Company Equipment ID:	T-609C (processed oil storage tank, 187,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Group Name: Tanks, Level 2

Emissions Unit ID:	T063
Company Equipment ID:	OR-1 (wastewater storage tank, 72,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T064
Company Equipment ID:	T-002 (OR-1 oil phase receiving tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T065
Company Equipment ID:	T-001 (oil/water separator oil phase receiving tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T066
Company Equipment ID:	OR-2 (wastewater 72,000 gallon storage tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T067
Company Equipment ID:	surge tank (T-206; UF permeate surge tank, 1,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T068
Company Equipment ID:	T-1 (T-601; wastewater chemical conditioning tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T069
Company Equipment ID:	T-2 (T-506; wastewater sludge settling tank, 3,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T070
Company Equipment ID:	TW-1 (T-605; treated process waters storage tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T071
Company Equipment ID:	TW-1a (TW-1 surge tank, 800 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T072
Company Equipment ID:	T-602 (chemical conditioning tank 2)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T073
Company Equipment ID:	T-603 (chemical conditioning tank 3)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T074
Company Equipment ID:	lamella (T-604)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T075
Company Equipment ID:	G-1 (T-801A; G-cone high solids process vessel)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T076
Company Equipment ID:	G-2 (T-801B; G-cone high solids process vessel)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T077



Company Equipment ID:	G-3 (T-801C; G-cone high solids process vessel)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T078
Company Equipment ID:	T-808 (filter press feed tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T079
Company Equipment ID:	B-1 (process oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T080
Company Equipment ID:	B-2 (process oils storage tank, 17,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T081
Company Equipment ID:	B-3 (process oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T082
Company Equipment ID:	B-4 (process oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T083
Company Equipment ID:	C-2 (wastewater storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T084
Company Equipment ID:	C-3 (raw oils solids storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T085
Company Equipment ID:	C-4 raw oil storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T086
Company Equipment ID:	P-1 (process oils storage tank, 18,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T087
Company Equipment ID:	P-2 (process oils storage tank, 18,500 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T088
Company Equipment ID:	R-1 (raw oils storage tank, 20,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T089
Company Equipment ID:	R-2 (raw oils storage tank, 20,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T090
Company Equipment ID:	S-9 (storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T091
Company Equipment ID:	S-10 (raw oils storage tank, 30,000 gallon)
Superseded Permit Number:	



General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T092
Company Equipment ID:	S-11 (raw oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T093
Company Equipment ID:	S-12 (raw oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T094
Company Equipment ID:	S-25 (crank case oils storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T095
Company Equipment ID:	S-26 (crank case oils storage tank, 16,700 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T096
Company Equipment ID:	S-27 (crank case oils storage tank, 23,400 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T097
Company Equipment ID:	W-1 (raw oils storage tank, 30,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T098
Company Equipment ID:	W-2 (raw oils storage tank, 18,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T099
Company Equipment ID:	W-5 (wastewaters storage tank, 23,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T100
Company Equipment ID:	W-6 (wastewaters storage tank, 23,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T101
Company Equipment ID:	tricanter oil receiving tank (T-006)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T102
Company Equipment ID:	centrifuge oil phase receiving tank (T-003)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T103
Company Equipment ID:	centrifuge water phase receiving tank (T-004)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T104
Company Equipment ID:	sweco-02 oil receiving tank (T-005)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T105
Company Equipment ID:	sweco-01 oil receiving tank (T-007)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T106



Company Equipment ID:	SBR (T-705; high cod wastewaters, 125,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T107
Company Equipment ID:	VDR (T-703; high cod wastewaters, 425,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Transfer Systems

Emissions Unit ID:	P010
Company Equipment ID:	building B wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	building B wastewater drain system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	building B oil transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	condenser transfer system (heat exchanger)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	hazardous waste fuel transfer system (containers to trucks)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	S-71 transfer system (hose/hard piping drain system)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	building G wastewater individual drain system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	building G wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	building G solids/sludge transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	bioplant wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	bioplant wastewater individual drain system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	transfer pad A system, wastewater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	P022
Company Equipment ID:	transfer pad A transfer system, raw and process oil
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	transfer pad B transfer system, wastewater,raw & process oil
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	transfer pad B transfer system, hazardous waste fuel bulking
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	transfer pad B transfer system, non-hazardous waste bulking
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	transfer pad C transfer system, wastewater,raw & process oi
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	transfer pad D transfer system, wastewater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	transfer pad E transfer system, wastewater and process oil
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install
Permit Number: 08-04938
Facility ID: 0857751312

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 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 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) The permittee must comply with all terms and conditions of this permit. 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 Regional Air Pollution Control Agency.



- (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 Regional Air Pollution Control Agency. 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 (i.e., postmarked) to the Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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.
- d) The permittee shall submit progress reports to the Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency.
- 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 Regional Air Pollution Control Agency. 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 (i.e.,



postmarked) 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).

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 party 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 through completion of the annual PER covering the last period of operation 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 PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online 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 (i.e., postmarked), 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.



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17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

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.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None
2. The emissions units contained in this permit are subject to MACT 40 CFR Part 63, Subpart DD, National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations. The complete MACT requirements will be established in the Title V permit for this facility which will encompass these emissions units upon issuance.

The permittee shall comply with the applicable provisions of the MACT as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DD. Various standards and compliance requirements of 40 CFR Part 63, Subpart DD are applicable to not only permitted emissions units but also their auxiliary components that affect air emissions. In addition, Subpart DD cross-references the following other subparts in Part 63 for the air emissions control requirements to be applied to specific types of affected sources.

Subpart OO National Emission Standards for Tanks - Level 1

Subpart PP National Emission Standards for Containers

Subpart QQ National Emission Standards for Surface Impoundments

Subpart RR National Emission Standards for Individual Drain Systems

Subpart VV National Emission Standards for Oil-Water Separators and Organic-Water Separators

The permittee currently has no emissions units or sources of emissions subject to Subpart QQ National Emission Standards for Surface Impoundments.

3. All the emissions units contained in this permit are subject to BAT requirements of OAC rule 3745-31-05(A)(3), and the limitations of OAC rule 3745-21-07(G). OAC rule 3745-21-07(G) is less stringent than the requirements of MACT Subpart DD.
4. The following tank emissions units are potentially subject to the NSPS 40 CFR Part 60, Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984: T045, T052, T060, T061, and T062 listed in the Emissions Unit Group named Tanks, Level 1; and T063, T066, T079, T081, T082, T088, T089, T090, T091, T092, T093, T096, T097, T099, T100, T106, and T107 listed in the Emissions Unit Group named Tanks, Level 2.
5. All the emissions units contained in this permit are subject to the Consent Decree for settlement of the Civil Action No. 3:04 CV 00418, entered and filed on 2/12/2008, in the United States District Court for Southern District of Ohio Western Division. The settlement will be referred to as the "Consent Decree" throughout this permit.
6. As required by the Consent Decree and specified in 40 C.F.R Part 63.6(e)(3), the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the Startup, Shutdown, and Malfunction Plan (SSMP) (Revision 1.0, May 2008 or the most recent acceptable update of this plan) submitted May 14, 2008 for operating and maintaining affected emissions units during periods of startup, shutdown, and malfunction.



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7. As required by the Consent Decree, the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the "TANKER LOADING" Standard Operating Procedure manual (Rev 1, 5/08 or the most recent acceptable update of this plan) submitted May 14, 2008 for loading tanker trucks.

8. As required by the Consent Decree, the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the "MATERIAL ACCEPTANCE" Standard Operating Procedure manual (Rev 1, 6/08 or the most recent acceptable update of this plan) submitted June 16, 2008 for assuring the facility will not violate limitations of this permit, Subpart DD, or cause excessive odors off-site from the facility.



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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Containers, Level 1: P029

EU ID P029	Operations, Property and/or Equipment Description drum bulking, hazardous waste containers 0.1 to 0.46 m3
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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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from this emissions unit does not exceed 40 pounds per day.

(2) Additional Terms and Conditions

a. This emissions unit was installed prior to August 3, 2006, therefore, is still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components associated with this emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.

c. The standards that apply to this emissions is identified in Section 63.688(b)(1) of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.922 of Subpart PP of 40 CFR Part 63 - National Emission Standards for Containers.



- d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-0097, October 4, 1999.
- e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- f. This emissions unit must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(1) of Subpart DD and 63.922(b) – (c) of 40 CFR Part 63 Subpart PP	level 1 standards and control for containers
63.688(b)(1) of Subpart DD and 63.922(d) of 40 CFR Part 63 Subpart PP	operation of containers using level 1 controls
63.688(b)(1) of Subpart DD and 63.922(e) of 40 CFR Part 63 Subpart PP	inspection of containers using level 1 controls

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(1) of Subpart DD, and 63.922(e) and 63.926(a) of 40 CFR Part 63 Subpart PP	inspection of containers using level 1 controls
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e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.967(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements



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- f) Testing Requirements
 - (1) None.

- g) Miscellaneous Requirements
 - (1) None.



2. Emissions Unit Group - Containers, Level 2: P030, P031, P032, P033, P034, P035, P036, P037, P038

EU ID	Operations, Property and/or Equipment Description
P030	tricanter solids receiving drum (drum -006; tricanter solids discharge to 55 gallon drum))
P031	sweco-02 solids receiving drum (drum-005; sweco oily solids discharge to 55 gallon drum))
P032	evaporator bottoms tote (tote-203; evaporator sludge collection (oil/water) in 250 gallon tote)
P033	condensate light ends receiver tote (tote-205; light hydrocarbon 250 gallon potable tote)
P034	drum bulking, hazardous waste containers > 0.46 m3
P035	drum bulking, hazardous waste tanker trucks
P036	filter press permeate tote (tote-807; filter press hazardous permeate receiving tote, 250 gallon)
P037	sweco-01 solids receiving drum (drum-007; sweco oil solids discharge to 55 gallon drum)
P038	building B wastewater treatment filter cake roll-off container, 20-yd3

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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from each emissions unit does not exceed 40 pounds per day.



(2) Additional Terms and Conditions

- a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).
- b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.
- c. The standards that apply to these emissions units are identified in Section 63.688(b)(3) of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.922 of Subpart PP of 40 CFR Part 63 - National Emission Standards for Containers.
- d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-0097, October 4, 1999.
- e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- f. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD and 63.923(b) of 40 CFR Part 63 Subpart PP	level 2 standards and control for containers
63.688(b)(3) of Subpart DD and 63.923(c) – (d) of 40 CFR Part 63 Subpart PP	operation of containers using level 2 controls
63.688(b)(3) of Subpart DD, and 63.923(b) and 63.926(a) of 40 CFR Part 63 Subpart PP	criteria for containers that can be used for level 2 control

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD, and 63.923(e) and 63.926(a) of 40 CFR Part 63 Subpart	inspection of containers using level 2 controls
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PP	
63.688(b)(3) of Subpart DD, and 63.923(b)(1) and 63.923(f) of 40 CFR Part 63 Subpart PP	procedures to determine containers meet U.S. DOT regulations when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(a) of 40 CFR Part 63 Subpart PP	procedures to determine containers operate with no detectable organic emissions when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(b) of 40 CFR Part 63 Subpart PP	procedures to determine containers are vapor tight when using that level 2 control option

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.967(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group - Oil/Water Separators: P002, P003, P004, P005, P006, P007. Each unit has fixed roof vented through closed-vent system to a RTO control device.

EU ID	Operations, Property and/or Equipment Description
P002	oil/water separator (T-402)
P003	Tricanter
P004	centrifuge 1
P005	centrifuge 3
P006	sweco-01 (sweco vibratory screen)
P007	sweco-02 (sweco vibratory screen)

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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)f. below.
c.	40 CFR Part 63, Subpart A	See b)(2)g below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The capture and control efficiency established pursuant to this rule is less stringent than the capture and control efficiency established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.



(2) Additional Terms and Conditions

- a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).
- b. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.
- c. The standards that apply to these emissions units are identified in Section 63.686 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.1044 of Subpart VV - National Emission Standards for Oil-Water Separators and Organic-Water Separators.
- d. The total OC (less methane and ethane) or total HAP (see Table 1 to Subpart DD of 40 CFR Part 63) emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.
- e. Subpart DD of 40 CFR Part 63 contains a provision that allows 240 hours of operation without the RTO during "planned routine maintenance" as defined under 40 CFR Part 63.693(b)(3)(i). During planned routine maintenance, these emissions units are subject to OAC rule 3745-15-06(A)(3).
- f. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in "The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD", EPA-456/R-99-0097, October 4, 1999.
- g. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- h. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.686(b)(2)	fixed roof standards (collection and control) for oil-water separators and organic-water separators
63.693(c)(1)(ii)	closed-vent system requirements



63.693(a)(3)	operation, shutdown, and routine maintenance of control device
63.693(f)	vapor incinerator control device requirements (destruction efficiency)

- (2) In accordance with Consent Decree and criteria specified in 40 CFR Part 63.686(b)(2), emissions from the emissions units listed above shall be captured and controlled using a fixed roof that is vented through a closed-vent system to a control device in accordance with applicable provisions specified in 40 CFR Part 63 Subpart VV-National Emissions Standards for Oil-Water Separators and Organic-Water Separators, and the emissions shall be directed to a RTO for control.

All of the VOC emissions from the emissions units listed above shall be vented to a RTO when one or more of the emissions units are in operation.

- (3) In accordance with the Consent Decree and to satisfy requirements of this permit, the permittee shall operate and maintain a continuous monitoring and recording system which measures and records the combustion chamber temperature, recovery bed temperature, and stack exhaust temperature for the RTO when the emissions units are in operation. The monitoring and recording devices shall be meet the accuracy specification listed in 40 CFR Part 63.693(f)(3)(i). The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e) and subject to the recordkeeping and reporting requirements of 40 CFR Parts 63.696 and 63.697.
- (4) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.693(c)(1)(ii), the closed-vent system shall be designed and operated at a pressure below atmospheric pressure. A permanent pressure monitor shall be installed at a location(s) on the closed-vent system that will verify that negative pressure is being maintained in the entire closed-vent system when the emissions units and control device are operating.
- (5) In accordance with the Consent Decree, a pressure monitor shall be installed at a location immediately upstream of the RTO fan. A data acquisition system shall be installed and operated to monitor and record the differential pressure between the atmosphere at this location. The pressure monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.693(c)(1)(ii)	monitor pressure in closed-vent system
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63.693(b)(4), 63.685(g)(3) and 63.695(c)	inspection, monitoring and recordkeeping requirements of closed-vent system
63.693(b)(5) through (6), 63.696(b) and 63.695(e)	monitoring and recordkeeping requirements of control device
63.693(f)(3)	monitoring and recording temperature for vapor incinerator control device
63.695(e)(4)	excursion determination and criterion for control device
63.696(b)	recordkeeping requirements for control device
63.696(g)	semiannual records for planned routine maintenance operations for control device
63.696(h)	records for unexpected control device malfunctions

- (2) In accordance with the Consent Decree, the permittee shall perform quarterly inspections of the closed-vent system using the procedures outlined in 40 CFR Part 63.695(c).
- (3) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature measured within the RTO, when the emissions units controlled by the RTO are in operation, shall not be less than 1400 degrees Fahrenheit or not less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (4) In order to maintain compliance with Consent Decree and requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the recovery bed temperature and stack exhaust temperature measured for the RTO when the emissions units controlled by the RTO are in operation, shall not be less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (5) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the permittee shall observe the pressure monitor(s) installed on the closed-vent system specified in c)(4) above at least once per day on days the emissions units are operating, and record the observed measured pressure. In the event the pressure monitor(s) indicates there is not negative pressure in the closed-vent system, the permittee shall take necessary action to remedy the problem as soon as possible including, but not limited to, taking applicable actions prescribed in its Startup, Shutdown, and Malfunction



plan. Records associated with these requirements shall be kept on site and available for inspection for a minimum of three years.

- (6) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the differential pressure measured at the location immediately upstream of the RTO fan, when the emissions units controlled by the RTO are in operation, shall be at a minimum pressure differential that is not less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (7) The permittee shall collect and record the following information each day for the capture and control equipment:
 - a. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature within the RTO was less than 1400 degrees Fahrenheit or the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - b. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the recovery bed temperature and stack exhaust temperature measured for the RTO were less than the average minimum temperatures established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - c. all days when the emissions units were in operation, when it was observed that the pressure in the closed-vent system was not negative;
 - d. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the differential pressure measured at the location immediately upstream of the RTO fan was less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance; and
 - e. a log of the downtime for the closed-vent system, RTO, and monitoring equipment when the associated emissions units were in operation.
- (8) Whenever the monitored daily average values for: the combustion, recovery bed and stack exhaust temperatures for the RTO; the daily average differential pressure measured immediately upstream of the RTO fan; or the pressure of the close-vent system deviates from the limits specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.
- (9) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture or control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
- a. a description of the corrective action;
 - b. the date the corrective action was completed;
 - c. the date and time the deviation ended;
 - d. the total period of time (in minutes) during which there was a deviation;
 - e. the temperature readings and/or pressure differential readings, as appropriate, immediately after the corrective action was implemented; and
 - f. the name(s) of the personnel who performed the work.
- (10) Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.967(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements
63.697(a)(1) of Subpart DD and 63.9(h) of 40 CFR Part 63 Subpart A	notification of compliance status, within 60 days after compliance demonstration activity (performance test)
63.697(b)(1)	notification of performance tests
63.697(b)(2)	performance test reports
63.697(b)(3)	startup, shutdown, and malfunction reports



63.697(b)(4)	semi-annual summary report
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- (2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the closed-vent system and the RTO during the operation of the emissions units:
- a. each day when the average daily combustion, recovery bed and stack exhaust temperatures measured for the RTO fell below the minimum temperature limitations specified in this permit, or the average minimum temperatures established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - b. each day when it was observed the pressure in the closed-vent system was not negative;
 - c. each day when the differential pressure measured at the location immediately upstream of the RTO fan was less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - d. an identification of each incident of deviation described in d)(8) above where a prompt investigation was not conducted;
 - e. an identification of each incident of deviation described in d)(8) where prompt corrective action, that would bring the temperature and/or pressure differential into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - f. an identification of each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO or the RTO was not in operation. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.694(a)(11) and 63.694(l)	Testing methods and procedures to determine closed-vent and control device performance
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(2) Emission Limitation:

The total OC (less methane and ethane) or total HAP [defined in 40 CFR Part 63.693(f)(1)(ii) and Table 1 of 40 CFR Part 63, Subpart DD emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC, less methane and ethane, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.

Applicable Compliance Method:

Capture of the VOC emissions from these emissions units shall be achieved by use of a closed-vent system. The system shall be maintained under sufficient negative pressure to assure all of the emissions from the emissions units are captured. 40 CFR Part 63, Subpart DD requires that the permittee demonstrate the control device achieves the applicable performance requirements by conducting a compliance performance test of the closed-vent system and the control device (RTO) in accordance with the requirements specified in 40 CFR Part 63.693.

When conducting the performance test, 40 CFR Part 63 Subpart DD requires testing to be performed in accordance with and using the testing and procedures prescribed in 40 CFR Parts 63.694(a)(11) and 63.694(l). The sampling sites shall be selected using Method 1 or 1A of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(1)(i). The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(2). Compliance with the RTO total OC or total HAP destruction requirement shall be determined in accordance with the methods and procedures specified in 40 CFR Part 63.694(l)(3). To determine the RTO percent destruction efficiency, the owner or operator shall use Method 18 of 40 CFR Part 60, appendix A. Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 in 40 CFR Part 63, appendix A of this part may be used with approval of US EPA and the appropriate Ohio EPA District office or local air agency. The procedures specified in 40 CFR Parts 63.694(l)(3)(i) through (iii) shall be used to calculate percent destruction efficiency.

(3) The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on these emissions units within 180 days after issuance of this PTI in accordance with the following requirements.

- a. Emissions testing shall be conducted to demonstrate compliance with the required overall control efficiency of 95%. The following test methods as specified in 40 CFR Subpart DD shall be employed to measure the mass emission rates before and after the RTO to demonstrate compliance with the destruction requirement: USEPA test Methods 1 through 4 and 18 of CFR Part 60, Appendix A.
- b. An evaluation of the closed-vent system shall be conducted in conjunction with the compliance demonstration testing of the RTO in accordance with the following requirements.



- i. Perform an inspection of the closed-vent system for defects that could result in emissions leaks using the procedures outlined in 40 CFR Part 63.695(c)(2).
- ii. Measure the pressure differential between the inside of the closed-vent system and the atmosphere [see c)(4), c)(5), d)(5) and d)(6) above] during compliance demonstration of the RTO to demonstrate compliance with the requirement that the closed-vent system be maintained under negative pressure.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office=s or local air agency=s refusal to accept the results of the emission test(s).

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

The testing shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

- (4) Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group - Tanks, Level 1: T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T061, T062

EU ID	Operations, Property and/or Equipment Description
T044	S-71 (oily wastewater storage tank, 5,000 gallon)
T045	T-706B (bioplant equalization feed tank, 185,392 gallon)
T046	S-1 (process oils storage tank, 16,700 gallon)
T047	S-2 (process oils storage tank, 15,700 gallon)
T048	S-3 (process oils storage tank, 15,000 gallon)
T049	S-4 (cut oils storage tank, 15,000 gallon)
T050	S-6 (raw oils storage tank, 15,000 gallon)
T051	S-7 (raw oils storage tank, 15,000 gallon)
T052	S-13 (process oils storage tank, 30,000 gallon)
T053	S-14 (storage tank, 20,300 gallon)
T054	S-21 (storage tank, 16,700 gallon)
T055	S-22 (crank case oils storage tank, 17,500 gallon)
T056	S-23 (crank case oils storage tank, 18,350 gallon)
T057	S-24 (crank case oils storage tank, 15,000 gallon)
T058	S-28 (crank case oils storage tank, 14,400 gallon)
T059	W-4 (raw oil solids storage tank, 19,000 gallon)
T060	T609A (processed oil storage tank, 187,000 gallon)
T061	T-609B (processed oil storage tank, 187,000 gallon)
T062	T-609C (processed oil storage tank, 187,000 gallon)

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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from each emissions unit does not exceed 40 pounds per day.
e.	40 CFR Part 60, Subpart Kb (applicable to only emissions units T045, T052, T060, T061, and T062)	See d)(3). below.

(2) Additional Terms and Conditions

- a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).
- b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.
- c. The standards that apply to these emissions units are identified in Section 63.685 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.922 of Subpart OO - National Emission Standards for Tanks - Level 1.
- d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-0097, October 4, 1999.
- e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- f. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(c) of Subpart DD and 63.902(b) of 40 CFR Part 63 Subpart OO	level 1 standards and control for tanks
63.685(c)(1) of Subpart DD and 63.902(c) of 40 CFR Part 63 Subpart PP	operation of tanks using level 1 controls



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(c) of Subpart DD and 63.906(a) & (b) of 40 CFR Part 63 Subpart PP	inspection and monitoring of tanks using level 1 controls
63.685(c) of Subpart DD and 63.907 of 40 CFR Part 63 Subpart PP	Recordkeeping requirements of tanks using level 1 controls

- (2) The permittee shall conduct a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once every operating day. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the "CONTAINMENT AREAS" Standard Operating Procedure manual (Rev 0, 5/07 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.

- (3) Per 40 CFR Part 60.116b(b), the owner or operator of each storage vessel as specified in 40 CFR Part 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.967(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

- (1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.685(c) of Subpart DD, and 63.902(c)(2) and 63.904(b) of 40 CFR Part 63 Subpart PP	Testing methods and procedures to demonstrate container meets level 1 control performance
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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04938

Facility ID: 0857751312

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.

5. **Emissions Unit Group - Tanks, Level 2: T063, T064, T065, T066, T067, T068, T069, T070, T071, T072, T073, T074, T075, T076, T077, T078, T079, T080, T081, T082, T083, T084, T085, T086, T087, T088, T089, T090, T091, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T103, T104, T105, T106, T107. Each unit is vented through a closed-vent system to a RTO control device.**

EU ID	Operations, Property and/or Equipment Description
T063	OR-1 (wastewater storage tank, 72,000 gallon)
T064	T-002 (OR-1 oil phase receiving tank)
T065	T-001 (oil/water separator oil phase receiving tank)
T066	OR-2 (wastewater 72,000 gallon storage tank)
T067	surge tank (T-206; UF permeate surge tank, 1,500 gallon)
T068	T-1 (T-601; wastewater chemical conditioning tank, 4,000 gallon)
T069	T-2 (T-506; wastewater sludge settling tank, 3,500 gallon)
T070	TW-1 (T-605; treated process waters storage tank, 16,000 gallon)
T071	TW-1a (TW-1 surge tank, 800 gallon)
T072	T-602 (chemical conditioning tank 2)
T073	T-603 (chemical conditioning tank 3)
T074	lamella (T-604)
T075	G-1 (T-801A; G-cone high solids process vessel, 14,080 gallon)
T076	G-2 (T-801B; G-cone high solids process vessel, 14,080 gallon)
T077	G-3 (T-801C; G-cone high solids process vessel, 14,080 gallon)
T078	T-808 (filter press feed tank)
T079	B-1 (process oils storage tank, 30,000 gallon)
T080	B-2 (process oils storage tank, 17,500 gallon)
T081	B-3 (process oils storage tank, 30,000 gallon)
T082	B-4 (process oils storage tank, 30,000 gallon)
T083	C-2 (wastewater storage tank, 15,000 gallon)
T084	C-3 (raw oils solids storage tank, 15,000 gallon)
T085	C-4 raw oil storage tank, 15,000 gallon)
T086	P-1 (process oils storage tank, 18,500 gallon)
T087	P-2 (process oils storage tank, 18,500 gallon)
T088	R-1 (raw oils storage tank, 20,000 gallon)
T089	R-2 (raw oils storage tank, 20,000 gallon)
T090	S-9 (storage tank, 30,000 gallon)
T091	S-10 (raw oils storage tank, 30,000 gallon)
T092	S-11 (raw oils storage tank, 30,000 gallon)
T093	S-12 (raw oils storage tank, 30,000 gallon)
T094	S-25 (crank case oils storage tank, 15,000 gallon)
T095	S-26 (crank case oils storage tank, 16,700 gallon)
T096	S-27 (crank case oils storage tank, 23,400 gallon)
T097	W-1 (raw oils storage tank, 30,000 gallon)
T098	W-2 (raw oils storage tank, 18,000 gallon)
T099	W-5 (wastewaters storage tank, 23,000 gallon)
T100	W-6 (wastewaters storage tank, 23,000 gallon)
T101	tricanter oil receiving tank (T-006)
T102	centrifuge oil phase receiving tank (T-003)
T103	centrifuge water phase receiving tank (T-004)



EU ID	Operations, Property and/or Equipment Description
T104	sweco-02 oil receiving tank (T-005)
T105	sweco-01 oil receiving tank (T-007)
T106	SBR (T-705; high cod wastewaters, 125,000 gallon)
T107	VDR (T-703; high cod wastewaters, 425,000 gallon)

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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)f. below.
c.	40 CFR Part 63, Subpart A	See b)(2)g. below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The control efficiency established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.
e.	40 CFR Part 60, Subpart Kb (applicable to only emissions units T063, T066, T079, T081, T082, T088, T089, T090, T091, T092, T093, T096, T097, T099, T100, T106, and T107)	See d)(12). below.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).



- b. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.
- c. The standards that apply to these emissions units are identified in Section 63.685 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.
- d. The total OC (less methane and ethane) or total HAP (see Table 1 to Subpart DD of 40 CFR Part 63) emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.
- e. Subpart DD of 40 CFR Part 63 contains a provision that allows 240 hours of operation without the RTO during "planned routine maintenance" as defined under 40 CFR Part 63.693(b)(3)(i). During planned routine maintenance, these emissions units are subject to OAC rule 3745-15-06(A)(3).
- f. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in "The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD", EPA-456/R-99-0097, October 4, 1999.
- g. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- h. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.
- i. In accordance with the Consent Decree, the permitte has committed to applying the following additional controls to the bioplant, emissions units T106 and T107. See operational restrictions term c)(5).

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(d)(3) and (g)	standards for tanks using level 2 control by using a closed-vent system to a control device
63.685(d)(3) and (g)(2)	operation of tanks using level 2 control by using a closed-vent system to a control device
63.693(c)(1)(ii)	requirements for closed-vent system designed to operate below atmospheric



	pressure
63.693(c)(2)	requirements for closed-vent system that includes bypass device
63.693(b)(3)	operation, shutdown, and routine maintenance of control device
63.693(f)	vapor incinerator control device requirements
63.693(f)(1)	performance specifications for vapor incinerator control device (destruction efficiency)

- (2) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.685(d)(3) and (g), emissions from the emissions units listed above shall be captured and controlled using a fixed roof that is vented through a closed-vent system to a control device and the emissions shall be directed to a RTO for controlling the emissions.

All VOC emissions from the emissions units listed above shall be vented to a RTO when one or more of the emissions units are in operation.

- (3) In accordance with the Consent Decree and to satisfy requirements of this permit, the permittee shall operate and maintain a continuous monitoring and recording system which measures and records the combustion chamber temperature, recovery bed temperature, and stack exhaust temperature for the RTO when the emissions units are in operation. The monitoring and recording devices shall be meet the accuracy specification listed in 40 CFR Part 63.693(f)(3)(i). The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e) and subject to the recordkeeping and reporting requirements of 40 CFR Parts 63.696 and 63.697.
- (4) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.693(c)(1)(ii), the closed-vent system shall be designed and operated at a pressure below atmospheric pressure. A permanent pressure monitor shall be installed at a location(s) on the closed-vent system that will verify that negative pressure is being maintained in the entire closed-vent system when the emissions units and control device are operating.
- (5) In accordance with the Consent Decree, a pressure monitor shall be installed at a location immediately upstream of the RTO fan. A data acquisition system shall be installed and operated to monitor and record the differential pressure between the atmosphere at this location. The pressure monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).



- (6) The following additional controls shall be employed for emissions units T106 and T107 (bioplant).
 - a. For each day the bioplant is fed, the emissions unit T106 (“SBR”) and emissions unit T107 (“VDR”) must maintain dissolved oxygen (DO) levels above 1.0 ppm during the last two hours of the aeration stage of each batch. The SBR and VDR tanks may fail to meet this limit, but not more than one batch every two calendar weeks, as long as the subsequent batch is extended so that the reactor is allowed to aerate until the DO level is above 1.0 ppm for at least two hours.
 - b. The wastewater feed to the SBR and VDR tanks shall have a maximum food to microorganism (F/M) ratio of 0.30, measured as pound total organic compounds (TOC) influent per pound mixed liquor volatile suspended solids (MLVSS). The wastewater feed TOC shall be sampled and measured from the bioplant feed tank, emissions unit T045 (“T-706B”). The MLVSS shall be sampled and measured from the SBR and VDR. Compliance with the F/M ratio shall be determined on a weekly average basis. The F/M ratio shall be calculated on a daily basis.
 - c. The bioplant blowers shall not supply more than a total of 4,500 acfm of air to the SBR and VDR tanks, combined.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.693(c)(1)(ii)	monitor pressure in closed-vent system
63.693(b)(4), 63.685(g)(3) and 63.695(c)	inspection, monitoring and recordkeeping requirements of closed-vent system
63.693(b)(5) through (6), 63.696(b) and 63.695(e)	monitoring and recordkeeping requirements of control device
63.693(f)(3)	monitoring and recording temperature for vapor incinerator control device
63.695(e)(4)	excursion determination and criterion for control device
63.696(b)	recordkeeping requirements for control device
63.696(g)	semiannual records for planned routine maintenance operations for control device
63.696(h)	records for unexpected control device malfunctions



- (2) In accordance with the Consent Decree, the permittee shall perform quarterly inspections of the closed-vent system using the procedures outlined in 40 CFR Part 63.695(c).
- (3) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature measured within the RTO, when the emissions units controlled by the RTO are in operation, shall not be less than 1400 degrees Fahrenheit or not less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (4) In order to maintain compliance with Consent Decree and requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the recovery bed temperature and stack exhaust temperature measured for the RTO when the emissions units controlled by the RTO are in operation, shall not be less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (5) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the permittee shall observe the pressure monitor(s) installed on the closed-vent system specified in c)(4) above at least once per day on days the emissions units are operating, and record the observed measured pressure. In the event the pressure monitor(s) indicates there is not negative pressure in the closed-vent system, the permittee shall take necessary action to remedy the problem as soon as possible including, but not limited to, taking applicable actions prescribed in its Startup, Shutdown, and Malfunction plan. Records associated with these requirements shall be kept on site and available for inspection for a minimum of three years.
- (6) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the differential pressure measured at the location immediately upstream of the RTO fan, when the emissions units controlled by the RTO are in operation, shall be at a minimum pressure differential that is not less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance.
- (7) The permittee shall collect and record the following information each day for the capture and control equipment:
 - a. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature within the RTO was less than 1400 degrees Fahrenheit or the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - b. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the

- recovery bed temperature and stack exhaust temperature measured for the RTO were less than the average minimum temperatures established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
- c. all days when the emissions units were in operation, when it was observed that the pressure in the closed-vent system was not negative;
 - d. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the differential pressure measured at the location immediately upstream of the RTO fan was less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance; and
 - e. a log of the downtime for the closed-vent system, RTO, and monitoring equipment when the associated emissions units were in operation.
- (8) Whenever the monitored daily average values for: the combustion, recovery bed and stack exhaust temperatures for the RTO; the daily average differential pressure measured immediately upstream of the RTO fan; or the pressure of the close-vent system deviates from the limits specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.
- (9) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture or control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
- a. a description of the corrective action;
 - b. the date the corrective action was completed;
 - c. the date and time the deviation ended;
 - d. the total period of time (in minutes) during which there was a deviation;
 - e. the temperature readings and/or pressure differential readings, as appropriate, immediately after the corrective action was implemented; and



- f. the name(s) of the personnel who performed the work.
 - (10) Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
 - (11) In order to maintain compliance with the controls specified in operation restrictions term c)(5) above, the operational and procedural requirements identified in the “BIOPLANT – DISSOLVED OXYGEN AND MIXED LIQUOR VOLATILE SUSPENDED SOLIDS (MLVSS)” Standard Operating Procedures manual (Rev 0, 5/07 or the most recent acceptable update of this plan) contained in Appendix D of the Consent Decree shall be followed for measuring and maintaining DO levels and correct F/M levels in the Bioplant Sequencing Batch Reactor (SBR) and Variable Depth Reactor (VDR).
 - (12) The permittee shall conduct a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once every operating day. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the “CONTAINMENT AREAS” Standard Operating Procedure manual (Rev 0, 5/07 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.
 - (13) Per 40 CFR Part 60.116b(b), the owner or operator of each storage vessel as specified in 40 CFR Part 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.967(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements
63.697(a)(1) of Subpart DD and 63.9(h) of 40 CFR Part 63 Subpart A	notification of compliance status, within 60 days after compliance demonstration activity (performance test)
63.697(b)(1)	notification of performance tests
63.697(b)(2)	performance test reports
63.697(b)(3)	startup, shutdown, and malfunction reports
63.697(b)(4)	semi-annual summary report



- (2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the closed-vent system and the RTO during the operation of the emissions units:
 - a. each day when the average daily combustion, recovery bed and stack exhaust temperatures measured for the RTO fell below the minimum temperature limitations specified in this permit, or the average minimum temperatures established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - b. each day when it was observed the pressure in the closed-vent system was not negative;
 - c. each day when the differential pressure measured at the location immediately upstream of the RTO fan was less than the average pressure differential established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;
 - d. an identification of each incident of deviation described in d)(8) above where a prompt investigation was not conducted;
 - e. an identification of each incident of deviation described in d)(8) where prompt corrective action, that would bring the temperature and/or pressure differential into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - f. an identification of each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO or the RTO was not in operation. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.694(a)(11) and 63.694(l)	testing methods and procedures to determine closed-vent and control device performance
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- (2) Emission Limitation:

The total OC (less methane and ethane) or total HAP [defined in 40 CFR Part 63.693(f)(1)(ii) and Table 1 of 40 CFR Part 63, Subpart DD emissions from these



emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC, less methane and ethane, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.

Applicable Compliance Method:

Capture of the VOC emissions from these emissions units shall be achieved by use of a closed-vent system. The system shall be maintained under sufficient negative pressure to assure all of the emissions from the emissions units are captured. 40 CFR Part 63, Subpart DD requires that the permittee demonstrate the control device achieves the applicable performance requirements by conducting a compliance performance test of the closed-vent system and the control device (RTO) in accordance with the requirements specified in 40 CFR Part 63.693.

When conducting the performance test, 40 CFR Part 63 Subpart DD requires testing to be performed in accordance with and using the testing and procedures prescribed in 40 CFR Parts 63.694(a)(11) and 63.694(l). The sampling sites shall be selected using Method 1 or 1A of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(1)(i). The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(2). Compliance with the RTO total OC or total HAP destruction requirement shall be determined in accordance with the methods and procedures specified in 40 CFR Part 63.694(l)(3). To determine the RTO percent destruction efficiency, the owner or operator shall use Method 18 of 40 CFR Part 60, appendix A. Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 in 40 CFR Part 63, appendix A of this part may be used with approval of US EPA and the appropriate Ohio EPA District office or local air agency. The procedures specified in 40 CFR Parts 63.694(l)(3)(i) through (iii) shall be used to calculate percent destruction efficiency.

- (3) The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on these emissions units within 180 days after issuance of this PTI in accordance with the following requirements.
 - a. Emissions testing shall be conducted to demonstrate compliance with the required overall control efficiency of 95%. The following test methods as specified in 40 CFR Subpart DD shall be employed to measure the mass emission rates before and after the RTO to demonstrate compliance with the destruction requirement: USEPA test Methods 1 through 4 and 18 of CFR Part 60, Appendix A.
 - b. An evaluation of the closed-vent system shall be conducted in conjunction with the compliance demonstration testing of the RTO in accordance with the following requirements.
 - i. Perform an inspection of the closed-vent system for defects that could result in emissions leaks using the procedures outlined in 40 CFR Part 63.695(c)(2).
 - ii. Measure the pressure differential between the inside of the closed-vent system and the atmosphere [see c)(4), c)(5), d)(5) and d)(6) above]



during compliance demonstration of the RTO to demonstrate compliance with the requirement that the closed-vent system be maintained under negative pressure.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office=s or local air agency=s refusal to accept the results of the emission test(s).

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

The testing shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

- (4) Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group - Transfer Systems: P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028. Each unit uses continuous hard-piping.

EU ID	Operations, Property and/or Equipment Description
P010	building B wastewater transfer system (individual drain system, water transfer among bldg. B units)
P011	building B wastewater drain system (individual drain system, water transfer from bldg. B units)
P012	building B oil transfer system (process oil and solids knockout transfer from centrifuge system)
P013	condenser transfer system (heat exchanger)
P014	hazardous waste fuel transfer system (haz waste fuel from containers to tanker trucks)
P015	S-71 transfer system (hose/hard piping individual drain system, bldg. E)
P016	building G wastewater individual drain system (water transfer from G-1, G-2)
P017	building G wastewater transfer system (water transfer among bldg. G units)
P018	building G solids/sludge transfer system (solids/sludge transfer from G-3 to solidification)
P019	bioplant wastewater transfer system (individual drain system, water transfer among bioplant units)
P020	bioplant wastewater individual drain system (water transfer from bioplant to POTW)
P021	transfer pad A system, wastewater (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P022	transfer pad A transfer system, raw and process oil (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P023	transfer pad B transfer system, wastewater, raw and process oil (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P024	transfer pad B transfer system, hazardous waste fuel bulking (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P025	transfer pad B transfer system, non-hazardous waste bulking (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P026	transfer pad C transfer system, wastewater, raw and process oil (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P027	transfer pad D transfer system, wastewater (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)
P028	transfer pad E transfer system, wastewater and process oil (wastewater and oil transfer from loading rack to tanks; tanks to treatment processes)

- 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 operations(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. 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)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b through b)(2)e below.
c.	40 CFR Part 63, Subpart A	See b)(2)f below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The control efficiency established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.

(2) Additional Terms and Conditions

- a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).
- b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B.2 – Facility Wide Terms and Conditions.
- c. The standards that apply to all these emissions units are identified in Section 63.689 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations. Emissions units P010, P011, P015, P016, P019, and P020 are characterized as individual drain transfer systems according to definitions in Subpart DD and Subpart RR. Standards identified in Section 63.962 of Subpart RR - National Emission Standards for Individual Drain Systems apply to emissions units P010, P011, P015, P016, P019, and P020, also.
- d. The permittee shall use continuous hard-piping for all these transfer system emissions units which satisfies requirements of both Subpart DD and Subpart RR, and will comply with monitoring and recordkeeping requirements of Subpart RR and those included in d)(2) and d)(3). This will meet or exceed the level of control specified in the Consent Decree for these emissions units.
- e. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-0097, October 4, 1999.



- f. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.
- g. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.4 – Facility Wide Terms and Conditions.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.689(b) of Subpart DD and 63.962 of Subpart RR	standards and specifications for transfer and individual drain systems
63.689(c)(2)	standards and specifications for transfer systems consisting of continuous hard-piping

- (2) Emissions from these emissions units shall be controlled by using continuous hard-piping. All joints or seams between the pipe sections shall be permanently or semi-permanently sealed.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.689(b) of Subpart DD and 63.964 of Subpart RR	inspection and monitoring of transfer and individual drain systems
63.689(b) of Subpart DD, and 63.965(a) of Subpart RR	recordkeeping requirements for transfer and individual drain systems

- (2) The permittee shall perform a visual inspection of the wastewater transfer lines for defects that could result in liquid leaks on the wastewater transfer lines at least once a day on days of operation. Repair all detected liquid leaks as follows:

- a. The permittee shall make first efforts at repair of the liquid leak no later than 5 days after detection, and repair shall be completed as soon as possible but no later than 45 days after detection except that repair of a defect may be delayed beyond 45 days if PFD determines that repair of the defect requires emptying or temporary removal from service of the transfer system and no alternative transfer system capacity is available at the site to accept the regulated material normally managed in the transfer system. PFD shall repair the defect the next time the



process or unit that is generating the material handled by the transfer system stops operation.

- b. Repairs of liquid leaks, dates of inspections, and corrective actions taken to repair liquid leaks shall be recorded by the permittee. Inspection and corrective action records shall be maintained at the facility, including
 - i. the date of inspection,
 - ii. the location of the liquid leak,
 - iii. a description of the liquid leak,
 - iv. the date of detection, and
 - v. the corrective action taken to repair the liquid leak.

In the event that repair of the defect is delayed in accordance with this provision, the permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected. Records of these inspections shall be kept on site, available for review, for a period of 5 years.

- (3) The permittee shall perform a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once on days of operation. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the "CONTAINMENT AREAS" Standard Operating Procedure manual (Rev 0, 5/07 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.