State of Ohio Environmental Protection Agency

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3/2/2009

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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

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

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Regional Air Pollution Control Agency

Division of Air Pollution Control

Response to Comments

Project: Clean Water Ltd. Air Permit-to-Install (PTI)
Ohio EPA ID #: 08-04938

Agency Contacts for this Project

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Ohio EPA held a public hearing on December 4, 2008 regarding a draft PTI for Clean Water Ltd. This document summarizes the comments and questions received at the public hearing and during the comment period, which ended on December 10, 2008.

On February 12, 2008, U.S. EPA and Perma-Fix of Dayton, Inc. (PFD) entered into a consent decree, under the terms of which the facility agreed to be classified as a major source subject to U.S. EPA's hazardous air pollutants Maximum Achievable Control Technology (MACT) standard Subpart DD and to the Title V Operating Permit program. In March, 2008 PFD sold the facility to Clean Water Ltd. (CWL). CWL, as the current owner of the facility, has agreed to meet the obligations specified in the consent decree.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. In addition, a number of comments received may not appear below as they were either unrelated to the proposed project; were rhetorical in nature and do not ask for a response; or the comment stated a belief, opinion, or plea but did not voice a question to be answered. Nevertheless, all comments received are part of the official record and have received consideration by Ohio EPA in making a final decision on the issuance of this permit.

Odor Complaints

Comment 1: **Commenters want Ohio EPA to consider results of RAPCA's complaint and surveillance reports for Clean Water Ltd. (CWL) and are concerned that the PTI does not contain specific nuisance abatement requirements.**

Response 1: CWL is required under their permit to reduce nuisances such as odors. Odors may cause a nuisance, but are not considered a primary health threat. Ohio EPA acknowledges that odors may be present at CWL. However, proper operation of the emissions units and controls should minimize and hopefully eliminate odors. Citizens that smell nuisance odors should report them to RAPCA at (937) 225-4435 or Public Health – Dayton & Montgomery County, Environmental Health, (937) 225-4443.

CWL agreed to three supplemental environmental projects in the consent decree to improve the control of emissions and odors. These were:

1. the installation and operation of a demister prior to the regenerative thermal oxidizer (RTO)
2. installation and operation of an entrapment chamber to the exhaust of the RTO
3. painting the storage tanks

CWL completed these projects ahead of schedule and they are currently in operation. The demister and entrapment chamber have been included in the equipment description of the appropriate emissions unit groups and included as compliance requirements in the PTI.

Comment 2: **Comments were received requesting the complaint handling plan cited in the consent decree be included in the PTI.**

Response 2: Language has been added to the PTI in the Facility Terms and Conditions requiring CWL to implement a community response plan as specified in the consent decree.

Comment 3: **Comments were received stating that nuisance abatement is part of the State Implementation Plan (SIP) and should be included in the permit as Best Available Technology (BAT), and asked if other Ohio permits contain site specific nuisance abatement requirements.**

Response 3: Air pollution nuisances are prohibited by Ohio law, and this rule is a part of the Ohio SIP. However, this section of the law addresses only nuisances that may endanger public health or safety. BAT is a standard for abatement and control of air emissions. The emissions controlled under BAT do not need to be declared a nuisance. If Ohio EPA determines that a company has violated the nuisance rule, RAPCA and Ohio EPA will take appropriate enforcement action against the company.

Comment 4: **A citizen stated people are tired of calling in odor complaints to RAPCA and are concerned about the continuation of odors, are frustrated and concerned about health issues and want to be sure the facility is being properly regulated.**

Response 4: The final permit contains federally enforceable requirements which must be met by CWL. U.S. EPA established the emission limitations and control requirements of the MACT to reduce hazardous air pollutant (HAP) emissions to acceptable levels that include an ample margin of safety to protect public health and the environment. Although a facility may be operating and maintaining compliance with the emission limits and control requirements of the MACT standards, odors may still occur. The consent decree requires CWL to implement a community response plan that includes (1) public communication, (2) investigation procedures for responding to air pollution and odor

complaints, (3) quarterly newsletters and (4) recordkeeping. CWL is required to share community response plan records with the appropriate Ohio EPA District office or local air agency when requested. This requirement has been included in the final permit.

Comment 5: **A citizen asserts there is a high incidence of cancer in the community, and states a community health assessment should be a part of the permit to support whether or not the odors and the pollutants are directly impacting their lives.**

Response 5: Community health assessments are not included in the terms of air permits. The Director of Ohio EPA may consider the impact of a project/application on public health where an assessment has been performed. Community health assessments are typically conducted by other agencies such as the Ohio Department of Health (ODH) and the Agency for Toxic Substances and Disease Registry (ATSDR) if there is evidence which suggests it is warranted. In certain situations, local health departments will assist these agencies with community health assessments.

Due to the concerns of the neighborhood group regarding possible health risks to area residents from the odors associated with the operations at CWL, the group petitioned ATSDR for a community health assessment. ATSDR accepted the petition request and conducted a health consultation and exposure investigation. ATSDR concluded in the final report dated December 15, 2008 that none of the compounds sampled were detected in concentrations that would pose concern for human health.

In addition, Public Health-Dayton & Montgomery County (PHDMC), previously known as the Combined Health District of Montgomery County, has provided assistance and made services available to the citizens in the area of the CWL facility. In addition to offering access to medical care to the area residents, RAPCA (the local air pollution control agency within PHDMC) conducted outdoor air sampling in the vicinity of the CWL facility on two separate occasions. The sampling results were all below ATSDR's minimum risk levels.

<u>Potential to Emit</u>

Comment 6: **Commenters asked how potential to emit (PTE) was determined in regards to CWL's major source status; and the applicability of the MACT requirements specified in 40 CFR Part 63, Subpart DD for Off-site Waste Recovery Operations (OSWRO) to the CWL facility.**

Response 6: Prior to the consent decree, RAPCA reviewed data and calculations and developed estimates of the PTE for CWL. As part of the consent decree, CWL agreed to be classified as a major source subject to the requirements of the Title V Operating Permit program and the MACT Subpart DD. U.S. EPA, Ohio EPA and RAPCA have classified the entire CWL facility as a major source for purposes of these regulations. Once the PTI is issued final, the Title V Operating Permit for CWL will be processed.

Comment 7: **A commenter would like to know, in cases where the emissions rate of a unit is variable and difficult to predict, should determinations be made that would look at the minimum or maximum potential to emit in order to be protective of human health and the environment.**

Response 7: The current rules define "potential to emit" to mean the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant is treated as a

part of its design if the limitation or the effect it would have on emissions is federally enforceable or legally and practicably enforceable by the state. Examples of physical and operational limits include air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored or processed.

The emission levels calculated in accordance with the potential to emit definition are used to determine if the facility exceeds the major source thresholds for purposes of Title V permitting and MACT standard applicability. The emission limits and control requirements of the MACT standards have been established by U.S. EPA to reduce HAP emissions to acceptable levels that include an ample margin of safety to protect public health and the environment.

Unless there are federally, legally and practicably enforceable restrictions on the potential to emit, the maximum capacity of a source to emit is determined by combining a maximum hourly rate (in pounds per hour, lbs/hr) with continuous operation (8,760 hrs/yr).

Comment 8: **A commenter inquired about Ohio EPA's policy for determining potential to emit and whether the limits on potential to emit are enforceable.**

Response 8: Guidance on how to perform potential to emit (PTE) determinations can be found in the Ohio EPA Engineering Guides (4, 45, 61 and 68), which can be found at www.epa.state.oh.us/dapc/engineer/eguides.html. Enforceable limits are required if there is a need to limit the PTE to avoid a rule limitation or standard.

Comment 9: **A commenter wanted to know what enforceable means in Ohio.**

Response 9: Enforceable means that the emission limitations and permit requirements contained in a permit must be followed and a company's failure to comply with the terms of its permit could subject the company to orders, penalties and lawsuits by either the federal U.S. EPA or the state of Ohio.

Comment 10: **One person inquired whether there were any enforceable limits currently in place that limit the potential to emit at the CWL facility and if so, how the conditions are enforced.**

Response 10: There are no limits currently in place to limit the potential to emit at CWL.

Comment 11: **One person inquired how the potential to emit is determined in Ohio if there are no enforceable limits.**

Response 11: If there are no enforceable permit limits the potential to emit is determined based on the maximum capacity of the equipment or process, the maximum operating schedule (8,760 hours per year) and federal and state regulations.

Clean Air Act/ MACT Rules

Comment 12: **A commenter is concerned that if only the consent decree is being implemented in the PTI, if U.S. EPA determines the MACT needs to be revised, the revisions may not apply to CWL.**

Response 12: The PTI application was submitted to satisfy the requirements of the consent decree. The MACT standard is listed in the permit as an applicable regulation that CWL must

follow, and the permit requires CWL to comply with the specified level of control cited in the MACT and the requirements of the consent decree. Since MACT is cited as an applicable rule in the permit, if U.S. EPA revises its requirements, then the revisions will apply to the CWL facility.

Comment 13: **One person asked what is meant by "once in, always in" and if it applied to CWL.**

Response 13: U.S. EPA's "Once In, Always In" policy states that if a facility is a major source of HAPs for an applicable MACT standard, then the facility will always be subject to that standard as a major source. CWL is subject to the requirements of MACT Subpart DD. Upon issuance of the PTI, these requirements will become federally enforceable and the "Once, In Always In" policy will apply to CWL.

Comment 14: **A citizen asked if the requirements of Subpart DD were applicable to both major and minor sources, and what authority Ohio EPA has to subject the applicable requirements to these sources.**

Response 14: The requirements of MACT Subpart DD are applicable to major sources of hazardous air pollutants. RAPCA is a contractual representative of Ohio EPA and is a direct grantee of U.S. EPA. Through these agreements RAPCA and Ohio EPA implement and enforce federal and state air regulations.

Comment 15: **One person asked if there were any minor sources that RAPCA or Ohio EPA have made subject to MACT requirements and on what basis.**

Response 15: Minor sources that meet the definition of an "area source" are subject to MACT requirements for specific source categories. An area source is any stationary source of hazardous air pollutants that is not a major source. Some examples of area sources are secondary aluminum smelters and solvent degreasers.

Comment 16: **One person asked how RAPCA and/or Ohio EPA determines which requirements of Subpart DD applied to which units at the facility, if any of the regulatory agencies had conducted any testing, and if anyone reviewed CWL tests.**

Response 16: The level of control for each emissions unit was determined as part of the negotiations and settlement process for the consent decree using control standards and requirements in the MACT Subpart DD. Subpart DD allows for use of either direct measurement or knowledge of the off-site material stream for determining which control requirements shall apply to an emissions unit. In all cases, the required level of control on the emissions units in the PTI meets the requirements specified in Subpart DD, and for some emissions units the facility agreed in the consent decree to implement more stringent control requirements than were indicated by Subpart DD. No testing has been conducted at the facility by U.S. EPA, Ohio EPA or RAPCA.

If facility process operations change from what was projected during the consent decree settlement process and subsequently included in the permit, CWL is responsible for conducting the appropriate studies and testing to determine the requisite level of control. Language was added to the permit reaffirming that CWL shall perform a new determination whenever changes to the off-site materials managed in any of the emissions units could potentially require a higher level of control from that stated in the PTI. Compliance testing performed by CWL will be witnessed and reviewed by RAPCA.

Comment 17: **One commenter stated that under section 112(r) of the Clean Air Act, a risk management plan should be submitted and included in the permit. Another commenter asked if RAPCA and/or Ohio EPA have ensured compliance with requirements for a risk management plan.**

Response 17: The Clean Air Act lists threshold quantities for substances that would require a risk management plan (RMP). CWL has reported that they do not have listed chemicals on-site in quantities that would trigger the RMP rule. Therefore, it is not necessary for CWL to submit a RMP at this time. CWL re-evaluates applicability of the rule periodically as part of their self-audit program. If CWL becomes subject to this regulation sometime in the future, then they would be required to comply.

Comment 18: **Some commenters expressed concern that testing was not done to determine the appropriate level of control required by MACT Subpart DD, and those emissions unit groups specified in the permit with level one control (i.e., Containers, Level 1 and Tanks, Level 1) may be under-controlled.**

Response 18: Subpart DD allows for use of either direct testing or knowledge of the material streams to determine the volatile organic hazardous air pollutant (VOHAP) concentrations and HAP vapor pressures, which are in turn used to determine which control specifications of Subpart DD apply. The required control for each emissions unit was determined as part of the negotiations and settlement process and specified in the consent decree. From conversations with U.S. EPA, RAPCA understands that U.S. EPA and the facility evaluated information on the material streams and processes to determine which sources required control, and to assess the required level of control specified in the consent decree for each emission unit.

For emissions unit group Tanks, Level 1, U.S. EPA and CWL evaluated information on the material streams and processes to conservatively determine HAP vapor pressures to assess the required level of control for each tank at the facility. For those tanks where it was determined possibly level 2 control would be applicable, the parties agreed level 2 control would be required as the minimum control for those units as specified in the consent decree. The final permit is written in accordance with the consent decree, and some of the tanks will be controlled at a more stringent level than would be prescribed by Subpart DD alone. The facility is required under Subpart DD to conduct the appropriate studies and determine the requisite level of control in the event their process operations change or vary from what was projected during the consent decree settlement process, and subsequently included in the PTI. Prior to implementing such a change, CWL must request a permit modification from Ohio EPA and receive approval for the change in the operation and the level of control. To be clear on the materials allowed to be processed in tanks with level 1 controls, terms were added in the operational restrictions for the Tanks, Level 1 emissions unit group that specifies the limits of the vapor pressure of materials managed in those emissions units. In addition, monitoring and recordkeeping requirements were added specifying CWL must determine and maintain records of vapor pressure of the materials managed in those units in accordance with requirements of Subpart DD.

Emissions unit group Containers, Level 1 contains one emissions unit, P029. The size of the unit must be 0.1 to 0.46 cubic meters. For containers of this size, the level of control required by Subpart DD is contingent on whether the container is used for a waste stabilization process. Level 3 control would be required if the unit were used in a waste stabilization process, and a minimum of Level 1 control is required if it is not. Since the process in emissions unit P029 consists of drum bulking hazardous waste and does not include waste

stabilization, Level 1 control is correctly specified in the PTI for this emissions unit. Clarifying terms were added to the final permit in the operational restrictions for Containers, Level 1 and Containers, Level 2 emission units groups.

Major Source Status

Comment 19: **A citizen would like to know who is responsible for determining major source status in Ohio and who provides the oversight for these determinations.**

Response 19: RAPCA is a contractual representative of Ohio EPA and is a direct grantee of U.S. EPA. RAPCA is responsible for determining the major source status. Through the agreements with U.S. EPA and Ohio EPA, RAPCA implements and enforces federal and state air pollution regulations. Both Ohio EPA and U.S.EPA Region 5 are familiar with the determinations made with regard to this facility and have oversight of the facility.

Comment 20: **A citizen would like to know if RAPCA and U.S. EPA issued a Notice of Violation (NOV) on the basis of Perma-Fix of Dayton (PFD) being a major source.**

Response 20: On January 10, 2002 RAPCA issued an NOV to PFD based on RAPCA's determination from emissions estimates that the PFD facility potential to emit met the rule criteria for major source status. U.S. EPA issued a Finding of Violation/Notice of Violation to PFD on January 26, 2004 for failure to comply with MACT Subpart DD and for operating without a Title V operating permit. U.S. EPA issued an administrative order on September 21, 2004 to PFD requiring the facility to comply with MACT and to submit an application for a Title V operating permit. This situation was resolved with the issuance of the consent decree which became effective on February 12, 2008.

Emissions Monitoring

Comment 21: **One person asked if RAPCA and/or Ohio EPA had done any inspections to determine the emissions from CWL.**

Response 21: RAPCA has conducted numerous inspections of the facility. Emissions will be determined through stack testing, which are required in the final issued PTI.

Comment 22: **One person asked what is meant by the statement in the draft permit that "it is impossible to determine individual emissions rates for most of the emissions units.**"

Response 22: The draft PTI was issued with a permit strategy write-up attached to the front to describe the project. It is not part of the final PTI. The statement "…it is impossible to determine individual emissions rates for most of the emissions units" in the write-up was used to describe the problem of finding out and assigning an emissions rate or emissions limit to each emissions unit individually. The statement does not relate to the emission status for the facility.

Comment 23: **Comments were received expressing concern regarding the adequacy of the closed-vent system, its conformance to the applicable requirements and inclusion of the necessary monitoring requirements to verify proper operation of the system.**

Response 23: The PTI contains monitoring and recordkeeping requirements that CWL must fulfill to demonstrate the closed-vent system is operated and maintained properly. With the

issuance of the final PTI, the rules and requirements in the PTI will be federally enforceable and CWL will be required to demonstrate that the emissions units and the control equipment are in compliance.

The requirements specified in the consent decree for monitoring, recordkeeping and reporting the pressure of the closed-vent system are not identical to the requirements contained in Subpart DD. The PTI contains terms to satisfy both the requirements of the consent decree and Subpart DD.

Subpart DD requires that the closed-vent system be maintained below atmospheric pressure (i.e., negative pressure) and specifies the pressure be monitored to verify negative pressure is being maintained in the system. Subpart DD does not specify where in the closed-vent system the pressure must be measured, and it does not specify continuous monitoring and recording of the pressure. The PTI does require daily monitoring, recordkeeping and quarterly reporting anytime the pressure in the closed-vent system is not negative.

In accordance with the consent decree, the PTI requires continuous monitoring and recording of the pressure of the closed-vent system at a point immediately upstream of the regenerative thermal oxidizer (RTO) fan. It furthers states that this data must conform to the same inspection and monitoring requirements criteria of Subpart DD for the RTO control device. This includes continuous monitoring and recording, determination and comparison of daily averages to operating values established during the stack test, and determination of excursions. In addition, the PTI includes more stringent quarterly reporting requirements for any time the daily average pressure measured immediately upstream of the RTO deviates from the limit specified in the permit, as determined by stack testing.

RAPCA and Ohio EPA believe that overall the requirements contained in the PTI are more stringent than Subpart DD alone, and are appropriate and adequate to ensure proper operation of the closed-vent system.

Best Available Technology (BAT)

Comment 24: **A commenter would like to know how BAT is determined in Ohio, who is responsible for determining BAT and if there is a record of decision regarding BAT for CWL. Another comment was received stating newly modified emissions units are subject to BAT requirements and those requirements may be more stringent than those in the consent decree.**

Response 24: In Ohio, compliance with the requirements of an applicable MACT standard is sufficient to satisfy the BAT requirement. Ohio EPA and RAPCA are responsible for determining BAT for this PTI. All emissions units covered under this permit are subject to BAT. The PTI identifies MACT Subpart DD as BAT.

Comment 25: **Comments were received which referenced a permit-to-install for storage of aqueous waste and wastewater storage tanks at another facility located in Ohio: Spring Grove Resource Recovery. The comments asserted BAT for the storage of aqueous water and wastewater at an off-site waste recovery facility is defined by that permit and that it is more stringent than control requirements for similar units specified in this permit. Another commenter asked if the BAT determination for Spring Grove Resource Recovery is more stringent than the requirements in this permit.**

Response 25: There is no basis for requiring the same level or type of control required for Grove Resource Recovery for similar emissions units at CWL. The control system listed as BAT in the Grove Resource Recovery permit was voluntarily installed by the facility and was neither an Ohio EPA requirement nor was required by an applicable state or federal regulation.

Startup, Shutdown and Malfunction Plan

Comment 26: One commenter expressed concern with the Startup, Shutdown and Malfunction Plan (SSMP) submitted with the PTI application indicating the plan did not identify process control measures for periods of failure of the RTO or any components of the closed-vent system.

Response 26: RAPCA requested CWL submit an updated SSMP to address this concern. CWL submitted a revised SSMP to RAPCA on October 27, 2008. RAPCA has reviewed the revised SSMP and found it to be sufficient. During periods of scheduled maintenance and any malfunctions of the RTO, emissions units controlled by the RTO are subject to Ohio rules regarding equipment malfunctions. Language was added to the Additional Terms & Conditions section of the permit for the Oil/Water Separators and Tanks, Level 2 emissions unit groups to reference Ohio's rule.

Additional Concerns

Comment 27: A citizen stated the community received a strong judgment against CWL and the community wants Ohio EPA to support this with strict regulations. The commenter states the community is concerned about long term issues and if they are not resolved, more litigation will occur in the future.

Response 27: The PTI reflects the agreement in the consent decree which specifies MACT control requirements. These are the regulations applicable for this type of industry. Ohio EPA does not have the authority to write a permit that is more strict than the consent decree.

Comment 28: One person asked if it is the obligation of RAPCA and Ohio EPA to act in a manner that is protective of human health and the environment.

Response 28: RAPCA and Ohio EPA are obligated to protect human health and the environment. This is done within the authority and framework provided for in federal and state laws and rules.

Comments from Clean Water Ltd.

Comment 29: In the Permit Strategy Write-Up, Paragraphs 3, 4 and 5 identify the company name as "Clean Waters Limited (CWL)" and "Clean Water". The correct company name is Clean Water Ltd., abbreviated as CWL.

Response 29: The Permit Strategy Write-Up is attached and published to the draft PTI when it is issued. The Permit Strategy Write-Up will not be issued with the final PTI; however, we will note this change.

Comment 30: Page 30 of 55, paragraph c)(2) stipulates that all VOC emissions shall be vented to the RTO when one or more of the emission units are in operation.

However, these units operate independently of one another and any number of them may be shut down for cleaning or maintenance, or may be taken out of service, while others are operating. If, for example, two of the six affected sources in this group are not operating because they are being maintained, this requirement would have them connected to the RTO during such service because the other four affected sources are operating. While CWL performs cleaning, maintenance or otherwise takes an oil/water separator out of service, it may be necessary for safety precautions to isolate that unit from the closed-vent system and RTO. Therefore, this condition should be reworded to speak to operation and emission control of oil/water separators as independent units.

Response 30: The condition has been reworded to provide clarification. In addition, the similar term on page 44 of 55 for Tanks, Level 2 emissions unit group was reworded to maintain consistency.

Comment 31: Page 38 of 55, paragraph c) incorrectly references Subpart PP, Container Standards, for this emission group, which is Tanks subject to Level 1 controls of Subpart OO under 40 CFR 63.

Response 31: It has been changed to correctly reference 40 CFR Part 63, Subpart OO.

Comment 32: Page 39 of 55 paragraphs d) and f) incorrectly reference Subpart PP, Container Standards, for this emission group, which is Tanks subject to Level 1 controls of Subpart OO under 40 CFR 63.

Response 32: They have been changed to correctly reference 40 CFR Part 63, Subpart OO.

Comment 33: Page 48 of 55, paragraphs d)(10) and d)(11) refer to the Bioplant SOP with a date of 5/07. The correct SOP date is 5/08.

Response 33: The date listed on each the Containment Area SOP and the Bioplant SOP contained in the Appendices of the consent decree of the PTI is “05/07”and was cited in the draft PTI. To remain consistent with paragraphs 28 – 30 of the consent decree, we maintained the 5/07 date. Note the clause “or the most recent acceptable update of this plan” is included after the date for each SOP and the SSMP referenced in the PTI.

Note, upon receipt of the revised SSM Plan (Revision 2.0, October 2008) CWL submitted to RAPCA on October 27, 2008, the revision number and date of the SMM Plan referenced in term 6 of Section B Facility Wide Terms and Conditions, page 19 of 55 in the draft PTI, was updated to reflect the revised plan.

Comment 34: Page 55 of 55, paragraph d)(3) refers to the Containment Area SOP with a date of 5/07. The correct date is 5/08.

Response 34: See response to Comment 33.

End of Response to Comments

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

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

Facility ID: 0857751312
Permit Number: 08-04938
Permit Type: Initial Installation
Issued: 3/2/2009
Effective: 3/2/2009

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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

Table of Contents

Authorization 1
A. Standard Terms and Conditions 10
1. Federally Enforceable Standard Terms and Conditions 11
2. Severability Clause 11
3. General Requirements 11
4. Monitoring and Related Record Keeping and Reporting Requirements 12
5. Scheduled Maintenance/Malfunction Reporting 13
6. Compliance Requirements 13
7. Best Available Technology 14
8. Air Pollution Nuisance 14
9. Reporting Requirements 14
10. Applicability 15
11. Construction of New Sources(s) and Authorization to Install 15
12. Permit-To-Operate Application 16
13. Construction Compliance Certification 16
14. Public Disclosure 16
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 16
16. Fees 16
17. Permit Transfers 17
18. Risk Management Plans 17
19. Title IV Provisions 17
B. Facility-Wide Terms and Conditions 18
C. Emissions Unit Terms and Conditions 21
1. Emissions Unit Group - Containers, Level 1: P029 22
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 demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO 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, 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 demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO. 42
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. 53

Authorization

Facility ID: 0857751312
Facility Description: off site waste and recovery operations
Application Number(s): A0008562, A0036197
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: $33,250.00
Issue Date: 3/2/2009
Effective Date: 3/2/2009

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:	
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:	
Company Equipment ID:	tricanter solids receiving drum (drum -006)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	sweco-02 solids receiving drum (drum-005)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	evaporator bottoms tote (tote-203)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	condensate light ends receiver tote (tote-205)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	drum bulking, hazardous waste containers > 0.46 m3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	drum bulking, hazardous waste tanker trucks
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	drum bulking, hazardous waste tanker trucks
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	sweco-01 solids receiving drum (drum-007)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	Bldg B WWT Roll-off
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Oil/Water Separators

Emissions Unit ID:	
Company Equipment ID:	oil/water separator (T-402)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	tricanter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	centrifuge 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	centrifuge 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	sweco-01 (sweco vibratory screen)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
Company Equipment ID:	rotary vacuum drum filter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
Company Equipment ID:	S-14 (storage tank, 20,300 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	S-21 (storage tank, 16,700 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
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:	
Company Equipment ID:	T609A (processed oil storage tank, 187,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
Company Equipment ID:	OR-1 (wastewater storage tank, 72,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	T-002 (OR-1 oil phase receiving tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
Company Equipment ID:	OR-2 (wastewater 72,000 gallon storage tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
Company Equipment ID:	T-1 (T-601; wastewater chemical conditioning tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
Company Equipment ID:	TW-1a (TW-1 surge tank, 800 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	T-602 (chemical conditioning tank 2)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	T-603 (chemical conditioning tank 3)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	lamella (T-604)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
Company Equipment ID:	T-808 (filter press feed tank)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
Company Equipment ID:	C-2 (wastewater storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	C-3 (raw oils soilds storage tank, 15,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
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:	
Company Equipment ID:	S-9 (storage tank, 30,000 gallon)

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
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:	
Company Equipment ID:	W-5 (wastewaters storage tank, 23,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	W-6 (wastewaters storage tank, 23,000 gallon)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	tricanter oil receiving tank (T-006)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	centrifuge oil phase receiving tank (T-003)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	centrifuge water phase receving tank (T-004)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	sweco-02 oil receiving tank (T-005)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	
Company Equipment ID:	sweco-01 oil receiving tank (T-007)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
Company Equipment ID:	building B wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	building B wastewater drain system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	building B oil transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	condenser transfer system (heat exchanger)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	hazardous waste fuel transfer system (containers to trucks)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
Company Equipment ID:	building G wastewater individual drain system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	building G wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	building G solids/sludge transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	bioplant wastewater transfer system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	bioplant wastewater individual drain system

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	transfer pad A system, wastewater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
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:	
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:	
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:	
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:	
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:	
Company Equipment ID:	transfer pad D transfer system, wastewater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	transfer pad E transfer system, wastewater and process oil
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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.

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.

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 theses 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 2.0, October 2008 or the most recent acceptable update of this plan) submitted October 27, 2008 for operating and maintaining affected emissions units during periods of startup, shutdown, and malfunction.

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.

9. The permittee shall implement on-going measures to minimize and reduce odors from all emissions units at the facility. As required by the Consent Decree, the permittee shall implement a community response plan that includes (1) public communication, (2) investigation procedures for responding to air pollution and odor complaints, (3) quarterly newsletters, and (4) recordkeeping. The permittee shall share community response plan records with the appropriate Ohio EPA District office or local air agency when requested.

C. Emissions Unit Terms and Conditions

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

EU ID	Operations, Property and/or Equipment Description
P029	drum bulking, hazardous waste containers 0.1 to 0.46 m3

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. and b)(2)f. 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 – Facility Wide Terms and Conditions.

c. The standards that apply to this emissions are 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.5 – 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

(2) The design capacity of this emission unit shall not exceed 0.46 m^3 and shall not be used for treatment of material by a waste stabilization process as defined in section 63.681of 40 CFR Part 63, Subpart DD.

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 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

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.

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. and b)(2)f. 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 – 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.5 – 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

(2) These emissions unit shall not be used for treatment of material by a waste stabilization process as defined in section 63.681 of 40 CFR Part 63, Subpart DD.

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 sections:

63.688(b)(3) of Subpart DD, and 63.923(e) and 63.926(a) of 40 CFR Part 63 Subpart PP	inspection of containers using level 2 controls
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 demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO.

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., b)(2)h. and c)(2) 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 – 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). Malfunctions of the air pollution control equipment are subject to reporting requirements of OAC rule 3745-15-06(B).

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.5 – 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.

For the emissions units listed above, the VOC emissions from each unit shall be shall be vented through the closed-vent system to the RTO anytime the unit is in service and operational. The permittee shall operate the closed-vent system and RTO for control of emissions whenever 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 pressure inside the closed-vent system 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
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 pressure measured inside the closed-vent system 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 differential that is not less than the average pressure 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 pressure measured inside the closed-vent system 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

(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 pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the average pressure 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

(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. and b)(2)f. 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)(4). 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 – 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.5 – 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(b)(1), 63.685(c) and Table 3 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 OO	operation of tanks using level 1 controls

(2) As an alternative to controlling emissions from these emissions units using Tank Level 1 controls, the permittee may control the emissions from these emissions units using Tank Level 2 controls in accordance the provisions and requirements specified in 63.685(c)(2)(ii) and 63.685(d) of 40 CFR Part 63 Subpart DD.

(3) Per 63.685(b)(1) and Table 3 of 40 CFR Part 63 Subpart DD, the HAP vapor pressure of off-site material managed in the following emissions units shall be:

emissions unit ID	tank design capacity	maximum HAP vapor pressure
T044, T046-T051, T054-T059	less than 75 m^3 (19,813 gallon)	less than 76.6 kPa
T052, T053	equal to or greater than 75 m3 (19,813 gallon) and less than 151 m3 (39,900 gallon)	less than 27.6 kPa
T045,T060-T062	equal to or greater than 151 m3 (39,900 gallon)	less than 5.2 kPa

The permittee shall notify appropriate Ohio EPA District office or local air agency, and submit an application for and obtain a modification to this permit to install before managing materials in these emissions units that exceeds the HAP vapor pressures specified above.

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 sections:

63.685(c) of Subpart DD and 63.906(a) & (b) of 40 CFR Part 63 Subpart OO	inspection and monitoring of tanks using level 1 controls
63.685(c) of Subpart DD and 63.907 of 40 CFR Part 63 Subpart OO	recordkeeping requirements of tanks using level 1 controls
63.694(j) of Subpart DD	determination, monitoring and recordkeeping of HAP vapor pressure of off-site materials managed in tanks

(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) To demonstrate compliance with the HAP vapor pressure restrictions in section c) above, the permittee shall maintain records of the HAP vapor pressures for the off-site materials managed in each of these emissions units. In accordance with 63.685(c)(1) of 40 CFR Part 63 Subpart DD, the permittee shall determine the maximum HAP vapor pressure for off-site material composition managed in each of these emissions units using either direct measurement or by knowledge of the off-site materials. The permittee shall perform a new determination whenever changes to the off-site material managed in any of these emissions units could potentially cause the maximum HAP vapor pressure to increase to a level that could exceed the HAP vapor pressure restrictions listed above.

Determination of the HAP vapor pressure by direct measurement of the off-site materials shall be done using sampling procedures and analysis methods specified in 63.694(j)(2) of 40 CFR Part 63 Subpart DD. If using knowledge of the off-site materials to determine the HAP vapor pressure, documentation shall prepared and recorded in accordance with 63.694(j)(3) of 40 CFR Part 63 Subpart DD that presents the information used as the basis for the knowledge that the maximum HAP vapor pressure of the off-site material is less than the vapor pressure restrictions listed above.

(4) Per 60.116b(b) of 40 CFR Part 60 Subpart Kb, 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 63.905 of 40 CFR Part 63 Subpart OO	testing methods and procedures to demonstrate container meets level 1 control performance

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 demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO.

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., b)(2)h., b)(2)i., c)(2) and c)(6) 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)(13). 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 – 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). Malfunctions of the air pollution control equipment are subject to reporting requirements of OAC rule 3745-15-06(B).

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.5 – 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.

For the emissions units listed above, the VOC emissions from each unit shall be shall be vented through the closed-vent system to the RTO anytime the unit is in service and operational. The permittee shall operate the closed-vent system and RTO for control of emissions whenever 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 pressure inside the closed-vent system 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 pressure measured inside the closed-vent system 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 differential that is not less than the average pressure 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 pressure measured inside the closed-vent system 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 60.116b(b) of 40 CFR Part 60 Subpart Kb, 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 pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the average pressure 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

(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., b)(2)d., b)(2)g., and c)(2) 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 – 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.5 – 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.