



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/8/2011

Certified Mail

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0302020012
Permit Number: P0107935
Permit Type: Administrative Modification
County: Allen

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

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
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 Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

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



FINAL

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

Facility ID: 0302020012
Permit Number: P0107935
Permit Type: Administrative Modification
Issued: 4/8/2011
Effective: 4/8/2011



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

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Authorization

Facility ID: 0302020012
Facility Description: Petroleum Refinery and Storage
Application Number(s): M0001170
Permit Number: P0107935
Permit Description: This permit is an administrative modification to delete 40 CFR, Part 60, Subpart J applicability and associated language for this emission unit as no fuel gas combustion device is used to control the vapors from this EU. The thermal oxidizer has been permanently removed from service as of 3/27/2008.
Permit Type: Administrative Modification
Permit Fee: \$500.00
Issue Date: 4/8/2011
Effective Date: 4/8/2011

This document constitutes issuance to:

Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

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

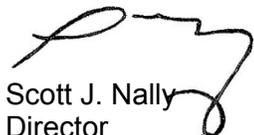
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107935

Permit Description: This permit is an administrative modification to delete 40 CFR, Part 60, Subpart J applicability and associated language for this emission unit as no fuel gas combustion device is used to control the vapors from this EU. The thermal oxidizer has been permanently removed from service as of 3/27/2008.

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

Emissions Unit ID:	P025
Company Equipment ID:	Oil/Water Separator System
Superseded Permit Number:	P0106824
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 of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) 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 Ohio EPA DAPC, Northwest District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations,

excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) 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 Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee

shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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 by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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 deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if 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 new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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.

C. Emissions Unit Terms and Conditions



1. P025, Oil/Water Separator System

Operations, Property and/or Equipment Description:

benzene NESHAPS sewer system including oil/water separator

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.
b.	OAC rule 3745-15-06(A)(3)	See b)(2)f.
c.	OAC rule 3745-21-09(M)	See b)(2)b.
d.	40 CFR, Part 61, Subpart FF [40 CFR 61.340 – 61.358] [In accordance with 40 CFR 61.340, this emissions unit is an affected source consisting of a sewer system and oil/water separator associated with wastewater operations for processing wastewater containing benzene.]	See b)(2)c., d)(1), d)(3) through d)(5), e)(1) and f)(1)
e.	40 CFR, Part 61, Subpart A	See 40 CFR 61.01 through 61.19
f.	40 CFR, Part 60, Subpart QQQ	See b)(2)d., d)(7), e)(3) and f)(2)
g.	40 CFR, Part 60, Subpart A	See 40 CFR 60.1 through 60.19
h.	40 CFR, Part 63, Subpart DD [40 CFR 63.680 – 63.698] [In accordance with 40 CFR 63.680, this emissions unit is an affected source since the facility accepts waste materials from other facilities for processing in this emissions unit and both of the following conditions in paragraphs (a)(1) and (a)(2) of 40 CFR 63.680 are applicable:	See b)(2)h.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>The plant site is a major source of hazardous air pollutant (HAP) emissions as defined in 40 CFR 63.2; and</p> <p>One or more operations at the facility receive off-site materials as specified in paragraph (b) of 40 CFR 63.680 and the operation is one of the waste management operations or recovery operations as specified in paragraphs (a)(2)(i) through (a)(2)(vi) of 40 CFR 63.680.]</p>	
i.	40 CFR 63.1 through 63.15	Table 2 to 40 CFR, Part 63, Subpart DD – Applicability of General Provisions to Subpart DD shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply.

(2) Additional Terms and Conditions

- a. PTI No. P0106824 was an administrative modification of PTI No. 03-07545 to delete the requirement to use a portable flare during periods of compressor maintenance. PTI No. 03-07545 modification was issued for installation of a new compressor system; as listed in paragraph No. 266 of the federal consent decree addendum, civil action No. SA07CA0683RF, dated 11/20/07. This installation was completed by the due date of April 1, 2008.

The permittee shall operate and maintain a compressor system to route all vapors from this emissions unit to the existing sulfur recovery unit fuel gas amine treater ("Compressor System").

- b. Except for any wastewater separator which is used solely for once-through, noncontact cooling water or for intermittent tank farm drainage resulting from accumulated precipitation, the permittee shall control the emissions of volatile organic compounds (VOC) from any wastewater separator by equipping all forebay sections and other separator sections with covers and seals which minimize the amount of oily water exposed to the ambient air. In addition, all covers and forebay and separator sections shall be equipped with lids and seals which are kept in a closed position at all times except when in actual use.
- c. During all times when the vent from this emissions unit is routed to the Compressor System used to compress vapors from emissions unit P025, the gaseous stream is exempt from 40 CFR, Part 61, Subpart FF, per 40 CFR 61.340(d). In accordance with 40 CFR 61.340(d), during these times, no testing,

monitoring, recordkeeping or reporting is required under this subpart for the vent stream from this emissions unit.

The permittee shall comply with the applicable control requirements, operating limits and emission standards under 40 CFR, Part 61, Subpart FF, including the following sections:

61.340(c)	Exempted Streams
61.342(a)(2) through 61.342(a)(4)	Total Annual Benzene Quantity Calculation Procedure – Material Sold, Remediation Waste, and Calculated Before Treatment
61.342(b)	Compliance Dates
61.342(c)(1)	General Operating Requirements and Definition of Exempt Waste Stream
61.342(e)(1)	6 Megagram Compliance Alternative – Less Than 10% Water Streams
61.342(e)(2)	6 Megagram Compliance Alternative – Greater Than or Equal to 10% Water Streams
61.342(g)	General Compliance Demonstration Procedure
61.345(a)(1)(i), 61.345(a)(1)(ii), 61.345(a)(2), 61.345(a)(3)(i), 61.345(a)(3)(ii)(B), 61.345(a)(3)(ii)(C), 61.345(a)(3)(iii) and 61.345(a)(4),	Standards: Containers – Annual No Detectable Emissions Check, Closed Sealed Covers; Pump Must Use Submerged Fill; Treatment of Waste Closed Vent/Control Device Options; Treatment of Waste Closed Vent/Control Device Design Requirements; Treatment of Waste – Covers With No Detectable Emissions; Treatment of Waste – Safety Devices Allowed; Negative Pressure
61.345(b)	Standards: Containers – Quarterly Visual Inspection
61.345(c)	Standards: Containers – Repair
61.346(a)(1) through 61.346(a)(3), 61.346(b)(1) through 61.346(b)(5)	Standards: Individual Drain Systems – Cover and Closed Vent, Quarterly Visual Inspection, Repair, Alternative Seal, Alternative Junction Box, Alternative Sewer Lines, Alternative Quarterly Inspection, and Alternative Repair



61.347(a) through 61.347(c)	Standards: Oil/Water Separators – Fixed Roof and Closed Vent, Quarterly Visual Inspection, and Repair
61.348(a)(1), 61.348(a)(2), 61.348(a)(4), 61.348(b)(2)(ii)(B), 61.348(d), 61.348(e)(1), 61.348(e)(2) and 61.348(g)	Standards: Treatment Processes – General Standards Compliance Options, Referenced Standards, Aggregation Allowed to Facilitate Treatment, Mixed Streams Conditions for Waste Management Unit Exemption, Exemption for Certain Treatment Processes, Quarterly Visual Inspection, Repair, Treatment Processes Shall Be Monitored Per 61.354
61.349(a)(1)(i) through 61.349(a)(1)(iv), 61.349(a)(2)(ii), 61.349(b), 61.349(c), 61.349(e), 61.349(f) and 61.349(g)	Standards: Closed-Vent Systems and Control Devices – No Detectable Emissions, Bypass Monitoring, Gauging and Sampling Systems, Permissible Vent Devices, Control Device Design Requirements, Operate Closed Vent System and Control Device During Operation, Control Device Compliance Demonstration, Testing of Control Device at Request of Administrator, Visual Inspection of Closed-Vent System and Control Device, and Repair Defects Within 15 Calendar Days
61.350(a) and 61.350(b)	Standards: Delay of Repair
61.354(d) and 61.354(f)	Monitoring of Non-regenerated Carbon Adsorption System, and Bypass Monitoring Requirements

- d. The permittee shall comply with the applicable standards required under 40 CFR, Part 60, Subpart QQQ, including the following sections:

60.692-1(a) through (d)	Standards: General
60.692-2(a)(1) through (e)	Standards: Individual Drain Systems
60.692-3(a) through (f)	Standards: Oil-Water Separators
60.692-4	Standards: Aggregate Facility
60.692-5(a) through (e)	Standards: Closed Vent Systems and Control Devices



60.692-6(a) and (b)	Standards: Delay of Repair
60.692-7(a) and (b)	Standards: Delay of Compliance

- e. The permittee shall identify and mark all area drains that are segregated storm water drains.
- f. During periods of compressor maintenance, recordkeeping and reporting for the compressor system shall be conducted in accordance with OAC rule 3745-15-06(A)(3).
- g. The permittee accepts chemical wastes from other facilities, and has the capability to process these waste materials in this emissions unit. Thus, the permittee shall comply with the applicable compliance dates and general standards under 40 CFR, Part 63, Subpart DD, including the following sections:

63.680(a)(1)	Applicability – Major Hazardous Air Pollutant Source
63.680(a)(2)(ii)	Applicability – Waste Management Operation Exemption from Treatment, Storage and Disposal Facility Requirements
63.680(b)(1), 63.680(b)(2)(iii) and 63.680(b)(2)(vi)	Off-site Material: Criteria, Exemption - RCRA Corrective Action, and Exemption – Benzene Waste Operations NESHAP
63.680(c)(1) and 63.680(c)(3)	Affected Sources: Off-site Material Management Units and Equipment Leaks
63.680(e)(1)(i)	Compliance Dates – Existing Sources
63.683(a)	General Standards
63.683(b)(1)(iii)	Volatile Organic Hazardous Air Pollutant Concentration Option
63.683(d)	Equipment Leaks
63.694	Testing Methods and Procedures

- h. This emissions unit is exempt from requirements in 40 CFR, Part 63, Subpart CC since the emission points are routed to a fuel gas system, as defined in 40 CFR 63.641 of this subpart. No testing, monitoring, recordkeeping, or reporting is required for refinery fuel gas systems or emission points routed to refinery fuel gas systems.



c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 61, Subpart FF, including the following sections:

61.356(a)	Maintain Records for 2 Years
61.356(b)(1), and 61.356(b)(4) through 61.356(b)(6)	Recordkeeping: Identity of Each Waste Stream, Whether it is Controlled for Benzene Emissions, and Related Data
61.356(d)	Recordkeeping: Design Documentation of Control Equipment
61.356(e)(1) through 61.356(e)(4)	Recordkeeping: Waste Treatment System Unit: Certification of Design, Design Analysis, Performance Tests and Control Device Records Per 61.356(f)
61.356(f)(1) and 61.356(f)(2)	Recordkeeping: Closed Vent System and Control Device: Certification of Design, Design Analysis, and Performance Tests
61.356(g)	Recordkeeping: Visual Inspections
61.356(h)	Recordkeeping: Test Results of No Detectable Emissions
61.356(i)	Recordkeeping: Unit Operation
61.356(j)(1) through 61.356(j)(3), and 61.356(j)(10)	Recordkeeping: Control Device Operation and Carbon Canister Breakthrough

(2) The permittee shall include the benzene NESHAPS sewer system, including oil/water separator, fugitive emissions and associated components in the current site leak detection and repair (LDAR) program. The LDAR program shall be conducted in accordance with the alternative monitoring plan submitted by the permittee.

Applicable requirements are listed in section B.2 of the Facility-Wide Terms and Conditions of this permit.

(3) The permittee shall conduct monthly visual inspections of all water traps within the Refinery's individual drain systems that are controlled under 40 CFR, Part 61, Subpart FF.

- (4) Where installed pursuant to 40 CFR, Part 61, Subpart FF, the permittee shall visually monitor all conservation vents or indicators on process sewers for detectable leaks on a weekly basis and reset any vents where leaks are detected. After two (2) years of weekly inspection, and based upon an evaluation of the recorded results, the permittee may submit a request to U.S. EPA Region V to modify the frequency of the inspections.
- (5) The permittee shall conduct quarterly monitoring, in accordance with the "no detectable emissions" provision in 40 CFR 61.347, of oil-water separators controlled in accordance with 40 CFR 61.347.
- (6) Once per shift, the permittee shall verify that the Compressor System is in operation. The permittee shall keep records of any instance when the Compressor System was not operating.
- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR, Part 60, Subpart QQQ, including the following sections:

60.695(a) through (c)	Parametric Monitoring Device for Appropriate Control Device
60.697(a) through (k)	Record Keeping Requirements

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR, Part 61, Subpart FF, including the following sections:

61.357(a)(1) through 61.357(a)(4)	Initial Report and Reporting for New Sources
61.357(d)(1)	Initial Certification
61.357(d)(2) and 61.357(d)(5)	Annual Benzene Waste Operations NESHAPS Report, Including Requirements Under 61.342(e)
61.357(d)(6) and 61.357(d)(7)(i)	Quarterly Report: Inspection Certification, and 10 ppm Benzene Exceedances
61.357(d)(7)(ii), 61.357(d)(7)(iii), 61.357(d)(7)(iv)(D), and 61.357(d)(8)	Annual Report: Treatment Process Exceedances, Benzene Exceedances, Exceedances in Control Device Exhaust, Carbon Canister Replacement Exceedances, and Problems Detected in Inspection



- (2) The permittee shall submit to the Administrator quarterly reports documenting all periods when the Compressor System was not operating. The first quarterly report shall be submitted by July 30, 2008. Subsequent quarterly reports shall be submitted on January 30, April 30, July 30 and October 30 each year.
- (3) The permittee shall submit reports and such other notifications and reports to the Ohio EPA, Northwest District Office as are required pursuant to 40 CFR, Part 60, Subpart QQQ, per the following sections:

60.698(a) through (e)	Reporting Requirements, including any deviations found during parametric monitoring
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f) Testing Requirements

- (1) The permittee shall comply with the applicable testing requirements required under 40 CFR, Part 61, Subpart FF, including the following sections:

61.355(a)(1) through 61.355(a)(3), and 61.355(a)(6)	Total Annual Benzene (TAB) Determination – Streams With Greater Than 10% Water, Sum Waste Streams, Requirements if 10 Megagrams Per Year or Greater, and Streams Generated Less Than One Time Per Year
61.355(b)(1)	TAB Determination – Streams Processed In Sour Water Strippers
61.355(b)(5) through 61.355(b)(7)	Methods for Determining Annual Waste Quantity (Options)
61.355(c)(1)(i)(A), 61.355(c)(1)(i)(D), 61.355(c)(1)(ii) through 61.355(c)(1)(v), 61.355(c)(2), and 61.355(c)(3)(i) through 61.355(c)(3)(v)	Determination of Flow-Weighted Annual Average Benzene Concentration: Sour Water Stripper Exemption, Process Turnaround Waste, Volatilization Not Used, Mixing or Dilution Not Used, Prior to Treatment, Multiple Phases, Waste Knowledge, Measurement, Waste in Enclosed Pipes, Sampling From Enclosed Pipes Not Feasible, Measurement Methods, and Calculation of Flow-Weighted Average
61.355(h)	Testing for No Detectable Emissions
61.355(k)(1), 61.355(k)(2)(i) through 61.355(k)(2)(v), and 61.355(k)(3) through 61.355(k)(7)	Determination of Benzene Quantity for 61.342(e)(2): Uncontrolled Streams, Controlled Streams Waste Entering Management Unit, Controlled Streams Wastes Not Treated, Controlled Streams



	Transferred Offsite, Controlled Streams Annual Waste Quantity Determination, Controlled Streams Flow Weighted Annual Average Benzene Concentration, Streams Generated Less Than One Time Per Year, Mixed Streams Entering Enhanced Biodegradation Unit, Sum Quantities for Streams, Controlled Streams Multiply Waste Quantity Times Flow-Weighted Annual Average Benzene Concentration, Multiple Counting of Streams
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- (2) The permittee shall comply with the applicable performance test methods, procedures and compliance provisions required under 40 CFR, Part 60, Subpart QQQ, section 60.696(a) through (d).
- g) Miscellaneous Requirements
 - (1) None.