

6/24/2011

Certified Mail

Mr. Bryan Zimmerman
TWO LLC - Veolia Water Americas
1819 Woodville Road
Oregon/Lucas, OH 43616-0920

Facility ID: 0448020080
Permit Number: P0107525
County: Lucas

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 4/27/2011. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,



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

Cc: Toledo Department of Environmental Services



Response to Comments

Response to comments for: Title V Permit

Facility ID:	0448020080
Facility Name:	TWO LLC - Veolia Water Americas
Facility Description:	WWTP
Facility Address:	1819 Woodville Road Oregon/Lucas, OH 43616-0920 Lucas County
Permit #:	P0107525, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 04/28/2011. The comment period ended on 05/28/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. 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. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **No comments received from the public.**



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for TWO LLC - Veolia Water Americas

Facility ID:	0448020080
Permit Number:	P0107525
Permit Type:	Renewal
Issued:	6/24/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
TWO LLC - Veolia Water Americas

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Authorization

Facility ID: 0448020080

Facility Description: WWTP

Application Number(s): A0040792

Permit Number: P0107525

Permit Description: Renewal Title V permit for TWO LLC/Veolia Water Americas, who owns and operates an API oil-water separator and other wastewater treatment equipment.

Permit Type: Renewal

Issue Date: 6/24/2011

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number: P0088574

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

TWO LLC - Veolia Water Americas
1819 Woodville Road
Oregon/Lucas, OH 43616-0920

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written 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.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Toledo Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
- (2) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.



- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

Records Retention Requirements Under State Law Only 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.

25. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))



26. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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 following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart CC, National Emission Standards for Hazardous Air Pollutants: Petroleum Refineries: P001, T105, T106, T108, T143, T144, T145, and T146. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[40 CFR, Part 63, Subpart CC]

3. The following emissions units contained in this permit are subject to 40 CFR, Part 61, Subpart FF, National Emission Standards for Benzene Waste Operations: P001. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[40 CFR, Part 61, Subpart FF]

4. The following emissions units contained in this permit are subject to 40 CFR, Part 60, Subpart GGG, Standards of Performance For Equipment Leaks of VOC In Petroleum Refineries For Which Construction, Reconstruction, Or Modification Commenced After January 4, 1983, and on or Before November 7, 2006: P001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[40 CFR, Part 60, Subpart GGG]

5. The following emissions units contained in this permit are subject to 40 CFR, Part 63, 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: T143, T144, T145, and T146. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[40 CFR, Part 60, Subpart Kb]

6. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:

F001 – paved roads. This source is classified as an insignificant activity per de minimis exemptions listed in OAC 3745-31-05. [formerly Z007];

F002 – unpaved roads. This source is classified as an insignificant activity per de minimis exemptions listed in OAC 3745-31-05. [formerly Z008];

P007 - Laboratory equipment and laboratory fume hoods. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(j). [formerly Z001];

P008 – Fugitive emissions from all maintenance welding. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(hh). [formerly Z003];

P009 – Fugitive emissions from cleanup activities associated with remedial action conducted entirely on-site on a periodic basis. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(2)(a). [formerly Z005];

P010 – Fugitive emissions from abrasive sand blasting activities. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(z). [formerly Z006];

T001 - Tank No. V-11009 is an aboveground 3,800 gallon tank that contains a 93% concentration of Sulfuric Acid. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(l)(vii). [formerly Z002];

T002 - Mobile gas truck with 90 gallon capacity used on vacuum and fork trucks. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(ff). [formerly Z004];

T003 - Tank No. V-11010, the tank is approximately 3,800 gallons. This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(l)(i). [formerly Z009]; and

T004 – Tank No. V-11024, the tank has a operating capacity of 4,700 gallons (Aluminum Chlorohydrate). This source is classified as an insignificant activity per the permit-to install exemptions listed in OAC 3745-31-03(A)(1)(l)(i). [formerly Z010]

[Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions



1. P001, Wastewater

Operations, Property and/or Equipment Description:

P001 - Wastewater Treatment Unit which was modified in 1992 to comply with NSPS. The WWTP includes the Screw pump lift station, API separator, the east and west DNF separators, the Stormwater System (JC-102 & 103), aeration feed sump (JC-104), the aeration tanks, area drain sump, activated sludge system, clarifiers, sand filters and effluent pump station. Carbon canisters arranged in series are used to control the VOC emissions.

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) (PTI 04-718, issued 7/15/1992 and modified on 1/18/2001)	<p>Volatile organic compounds (VOC) from the dissolved nitrogen flotation unit shall not exceed 11.15 lbs/hr and 48.8 tons per year</p> <p>VOC from the activated sludge system shall not exceed 5.70 lbs/hr and 24.97 tons per year</p>
b.	OAC rule 3745-21-09(M)(2)	See b)(2)e.
<i>Equipment subject to the Benzene Wastewater Regulations</i>		
c.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	See b)(2)f.
d.	40 CFR Part 63, Subpart CC (40 CFR 63.640-656) [In accordance with 40 CFR 63.640(a), this emissions unit is subject to the facility-wide wastewater program at an existing petroleum refinery subject to the emission limitations/control measures specified in this section for	<p>See b)(2)a., b)(2)b., b)(2)c. and b)(2)d.,</p> <p>Toledo Refining Co. contracts the treatment of the wastewater to TWO LLC (0448020080). TWO LLC is responsible for the monitoring of the treatment process and the final treatment of the water as defined in 40 CFR Part 61.354 and 61.348.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Group 1 and Group 2 wastewater streams.]	
e.	<p>40 CFR Part 61, Subpart FF (40 CFR 61.340-358)</p> <p>[In accordance with 61.340(a) and 61.342(b) this facility is a petroleum refinery at which the total annual benzene quantity from facility waste is equal to or greater than 10 Mg/yr (11 ton/yr) and subject to the emission limitations and control measures specified in this section.]</p>	<p>See b)(2)g.</p> <p>NOTE: Toledo Refining Co. (0448010246) contracts the treatment of the wastewater to TWO LLC, who is responsible for the monitoring of the treatment process and the final treatment of the water as defined in 40 CFR Part 61.354 and 61.348.</p>
f.	<p>40 CFR Part 61, Subpart A (40 CFR 61.01-19)</p>	General provisions of 40 CFR Part 61
<i>Equipment subject to VOC Leak Detection and Repair Regulations</i>		
g.	<p>40 CFR Part 60, Subpart GGG (40 CFR 60.590-593)</p> <p>[In accordance with 40 CFR 60.590(a), the compressor is an affected facility in a petroleum refinery as defined in 60.591 as equipment subject to Subpart GGG of this part.]</p> <p>(PTI 04-871, issued 1/26/1994 and modified on 1/18/2001)</p>	Pursuant to 40 CFR 60.592(a), each permittee subject to the provisions of this subpart shall comply with the requirements of 40 CFR 60.482–1 to 60.482–10 of subpart VV.
h.	<p>40 CFR Part 60, Subpart A (40 CFR 60.01-19)</p>	General provisions of 40 CFR Part 60
i.	<p>OAC rule 3745-21-09(T)</p> <p>[This regulation applies to petroleum refinery equipment leaks of volatile organic compounds from pump seals, pipeline valves, process drains, compressor seals and pressure relief devices.]</p>	See b)(2)i.

- (2) Additional Terms and Conditions
- a. [63.640(c) and (c)(3)]
For the purpose of 40 CFR Part 63, Subpart CC, the affected source shall comprise all emission points that are located at a single refinery plant site including all wastewater streams and treatment operations associated with petroleum refining process units meeting the criteria in 40 CFR 63.640(a).
- b. [63.640(o)(1)]
A Group 1 wastewater stream managed in a piece of equipment that is also subject to the provisions of 40 CFR Part 60, Subpart QQQ is required to comply only with 40 CFR Part 63, Subpart CC.
- c. WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
Pursuant to 40 CFR Part 63.647(a), the permittees of Group 1 wastewater streams shall comply with the requirements of 40 CFR Part 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each stream that meets the definition for Group 1 wastewater streams as stated in 63.641 (stated below).
- A Group 1 wastewater stream means a wastewater stream at a petroleum refinery with a total annual benzene loading of 10 megagrams per year or greater as calculated according to the procedures in 40.CFR 61.342 of Subpart FF that has a flow rate of 0.02 liters per minute or greater, a benzene concentration of 10 parts per million by weight or greater, and is not exempt from control requirements under the provisions of 40 CFR Part 61, Subpart FF. A Group 2 wastewater stream means a wastewater stream that does not meet the definition of Group 1 wastewater stream.
- d. The permittee currently employs a closed vent system with carbon adsorption as the control equipment; however, the permittee has the option of employing any of the control equipment listed in 40 CFR Part 61, Subpart FF and, as such, would be responsible for any associated monitoring, record keeping, reporting and/or testing requirements. Should a change in control equipment occur, the permittee shall notify the Toledo Division of Environmental Services within 30 days after installation.
- e. 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 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.
- f. Table 6 of 40 CFR 63, Subpart CC specifies the provisions of Subpart A that apply and those that do not apply to owners and operators of sources subject to 40 CFR 63, Subpart CC.

- g. [61.348(a)(1)]
Except as provided in 61.348(a)(5), the permittee shall treat the waste stream in accordance with the following requirements. The owner or operator shall design, install, operate, and maintain a treatment process that either:
 - i. Removes benzene from the waste stream to a level less than 10 parts per million by weight (ppmw) on a flow-weighted annual average basis;
 - ii. Removes benzene from the waste stream by 99 percent or more on a mass basis; or
 - iii. Destroys benzene in the waste stream by incinerating the waste in a combustion unit that achieves a destruction efficiency of 99 percent or greater for benzene.

- h. [OAC 3745-21-09(T)(1)]
Except as otherwise provided in OAC 3745-21-09(T)(b) and OAC 3745-21-09(T)(1)(c), the permittee shall establish a leak detection and repair program of this section, in compliance with the monitoring, record keeping and reporting requirements of this permit. NOTE: 40 CFR 63, subpart CC does not apply to TWO LLC for equipment leaks, per the definition stated in 63.641 for “in organic hazardous air pollutant service”. Also, 40 CFR 60, subpart VV does not apply to equipment leaks, per the definition stated in 60.481 for “in VOC service”.

c) Operational Restrictions

- (1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES
The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart CC including the following sections:

<i>For Wastewater</i>	
63.642(k)	Ccomply with the wastewater provisions of 63.647 of Subpart CC.
63.647(a) and (b)	For Group 1 wastewater streams, comply with the requirements of 40 CFR Part 61.340 through 61.355 of 40 CFR 61, Subpart FF. Group 1 and 2 wastewater streams are defined in 40 CFR Part 63.641.
63.647(c)	Requirements for periodic measurement of benzene concentration in wastewater and for operating parameters. Operating outside the permitted limits is a violation of the emission standards. Failure to perform required leak monitoring for closed vent systems and control devices as required by 61.349(c) or failure to repair leaks within the time period specified in 40 CFR Part 61, Subpart FF, constitutes a violation of this standard.

(2) [40 CFR 61, Subpart FF] NATIONAL EMISSION STANDARD FOR BENZENE WASTE OPERATIONS

The permittee shall comply with the applicable restrictions required under 40 CFR Part 61, Subpart FF including, but not limited to, the following sections:

61.342(c) and (c)(1)	<p><i>Standards General:</i> The Toledo Refining Co.'s total annual benzene waste is equal to or greater than 10 Mg/yr (11 ton/yr) therefore TWO LLC shall treat the waste as follows:</p> <p>For waste streams that contain benzene, remove or destroy the benzene using a treatment that complies with 61:348; comply with 61.343-61.347</p>
61.342(d)	Alternative requirements to those specified in 61.342(c) and 61.342(e).
61.342(f)	Requirements if arrangements are made to transfer waste offsite for treatment.
61.345(a)	<p><i>Standards for Containers:</i> All containers are to be covered and all openings in a closed, sealed position. Submerged fill pipe is used when waste is transferred into a container by pumping.</p>
61.346(a)(1)	<p><i>Standards for Individual Drain Systems:</i> Each individual drain system is to be covered and use a closed-vent system to route vapors to a control device.</p>
61.347(a)(1)	<p><i>Standards for Oil-Water Separators:</i> The permittee shall operate a fixed-roof and closed-vent system that routes all organic vapors from the oil-water separator to a control device.</p>
61.348(a)(2)	<p><i>Standards for Treatment Processes:</i> Each treatment process complying with paragraphs 61.348(a)(1)(i) or (a)(1)(ii) shall be designed and operated in accordance with the appropriate waste management unit standards specified in 61.343 through 61.347 of this subpart.</p>
61.349(a)(1)	<p><i>Standards for Closed-Vent Systems and Control Devices:</i> Operate and maintain a closed-vent system along with a control device.</p> <p>NOTE: TWO LLC uses a carbon adsorption system regenerated offsite as the control device. Other options are available upon notification.</p>
61.351	<p><i>Alternative Standards for Tanks</i> – this may apply to “tanks” as defined in 61.341 that are not permitted elsewhere in this permit.</p>



d) Monitoring and/or Recordkeeping Requirements

(1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES

The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart CC including the following sections:

63.647(c)	<p>If performing periodic measurement of benzene concentration in wastewater, or if monitoring process or control device operating parameters, then operate in a manner consistent with the minimum or maximum (as appropriate) permitted concentration or operating parameter values.</p> <p>It's a violation of the emission standards if operation of the process, treatment unit, or control device resulting in a measured concentration or operating parameter value outside the permitted limits.</p> <p>Failure to perform required leak monitoring for closed vent systems and control devices or failure to repair leaks within the time period specified in 40 CFR Part 61, Subpart FF constitutes a violation of the standard.</p>
63.655(a)	The permittee shall comply with the recordkeeping provisions of 40 CFR 61.356 of Subpart FF unless complying with the wastewater provisions in 40 CFR 63.640(o)(2)(ii).

(2) [40 CFR 61, Subpart FF] NATIONAL EMISSION STANDARD FOR BENZENE WASTE OPERATIONS

The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 61, Subpart FF including the following sections:

<i>Standards: General:</i>	
61.342(c)(2) and (c)(3)	Requirements to demonstrate waste streams that are exempt from 61.342(c)(1).
61.342(f)	Requirements for transferring the waste offsite for treatment.
61.342(h)	Requirements of the permittee to use an alternative means of compliance.
<i>Standards for Containers:</i>	
61.345(a)(1)	The containers must be monitored annually for leaks. Those greater than 500 ppmv above background are considered leaking.

	Each opening shall be maintained in a closed, sealed position.
61.345(a)(2)	Requirements when waste is transferred into a container by pumping, (i.e., use submerged fill).
61.345(a)(3)	Requirements for treating waste in a container.
61.345(a)(4)	Requirements if the cover and closed-vent system operates at a pressure less than atmospheric pressure.
61.345(b)	Each cover and all openings shall be visually inspected quarterly to ensure closed and gasketed
61.345(c)	First effort at repair is within 15 days. Visual inspections shall be performed quarterly.
<i>Standards for Individual Drain Systems:</i>	
61.346(a)	Drains are to have a cover and closed vent system. Monitored at least once a year; readings greater than 500 ppmv above background are considered leaking. First effort at repair shall be within 15 days for leaks and broken seals/gaskets. Visual inspections are required quarterly.
61.346(b), (b)(1) through (b)(5)	Alternative to complying with 61.346(a) for drain systems where: Drains are equipped with water seal controls or tightly sealed cap and visually inspected quarterly; Junction boxes are equipped with a cover and may have a vent pipe and visually inspected quarterly; Sewer lines are covered or enclosed and visually inspected quarterly; Repairs are required within 15 days.
<i>Standards for Oil-Water Separators:</i>	
61.347(a)	Meet the standards for oil-water separator in accordance with 61.342(c)(1)(ii). Operate and maintain a fixed-roof and closed vent system that routes all vapors to a control device. Other requirements for no detectable emissions, openings are to be in a closed sealed position and operating at a pressure less than atmospheric.
61.347(b)	Cover seal, access hatches and other openings are required to be visually inspected on a quarterly basis.



61.347(c)	For broken seals or gaskets or other problems, first effort at repair is as soon as practicable but no later than 15 days after identification.
<i>Standards for Treatment Processes</i>	
61.348(a)(3)	Reduction of the benzene concentration of a waste stream by dilution with other wastes or materials is not allowed.
61.348(a)(4) and (a)(5)	Aggregate waste streams.
61.348(b)	Requirements for aggregate waste streams for management and treatment.
61.348(c)	Demonstration required to show that each treatment process or wastewater treatment system unit achieves the appropriate conditions through engineering calculations or performance tests.
61.348(e)(1) and (e)(2)	Requirements for any openings (access doors, hatches, etc.) of the treatment process are required to be sealed and kept closed. The seals, access door, and openings are to be checked visually on a quarterly basis. Repairs are required within 15 days.
61.348(e)(3)	Requirements if the system has an opening on the treatment process that is maintained with a pressure less than atmospheric pressure.
61.348(f)	The Administrator may request that the permittee demonstrate that a treatment process or wastewater treatment system unit meets the applicable requirements specified in 61.348(a) or (b).
61.348(g)	Monitor the treatment process or wastewater treatment system unit in accordance with the applicable requirements in 61.354.
<i>Standards for Closed Vent Systems and Control Devices:</i>	
61.349(a) through (h)	Closed-vent systems and control devices shall be monitored annually for leaks. Readings greater than 500 ppmv above background are considered leaking. First effort at repair is required as soon as practicable, but no later than 5 calendar days after detection and repair shall be within 15 days after discovery. Visual inspections are required quarterly. Closed vent systems that contain a bypass line that could divert systems away from the control device shall be monitored by a flow indicator or be equipped with a valve secured, closed with a car-seal or lock and key.

	A vapor recovery system (e.g. a carbon adsorption system or condenser) shall recover or control organic emissions vented to it with an efficiency of 95 weight percent or greater, or shall recover or control the benzene emissions vented to it with an efficiency of 98 weight percent or greater.
<i>Delay of Repair:</i>	
61.350(a) and (b)	Delay of Repair is allowed if the repair is technically impossible without a partial or complete unit shutdown.
<i>Alternative Standards for Oil-Water Separators:</i>	
61.352	Alternative to the standards for oil-water separators specified in 61.347.
<i>Monitoring of Operations:</i>	
61.354(a)	Monitor each treatment process or wastewater treatment system unit to ensure the unit is properly operated and maintained: Measure benzene concentration of the waste stream exiting the treatment process once a month if complying with 61.348(a)(1)(i).
61.354(b)	If complying with 61.348(b), monitor each treatment process or wastewater treatment system unit to ensure the unit is properly operated and maintained using the procedures in 61.354(b)(1) and (b)(2).
61.354(c)	For closed-vent systems and control devices, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the control device operation as specified in the following paragraphs, unless alternative monitoring procedures or requirements are approved for that facility by the Administrator. Inspect at least once each operating day the data recorded by the monitoring equipment (e.g., temperature monitor or flow indicator) to ensure that the control device is operating properly.
61.354(d)	For carbon adsorption systems that do not regenerate the carbon bed directly on site, either the concentration level of the organic compounds or the concentration level of benzene in the exhaust vent stream from the carbon adsorption system shall be monitored on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The device shall be monitored on a daily basis or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater or



	follow the alternative stated in 61.354(d).
61.354(e)	Alternative operation or process parameter
61.354(f)	Requirements for closed-vent systems that contain bypass lines.
61.354(g)	If a system for emission control is maintained at a pressure less than atmospheric pressure with openings to provide dilution air the permittee shall calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the unit to ensure that it is less than atmospheric pressure.
<i>Recordkeeping Requirements:</i>	
61.356(a)	Comply with the recordkeeping requirements of this section and keep records in a readily accessible location at the facility.
61.356(b)	Maintain records that identify each waste stream; indicate whether or not the waste stream is controlled for benzene emissions in accordance with this Subpart; and maintain a list of exempt waste streams along with calculations and documentations.
61.356(c)	Requirements for transferring waste off-site for treatment.
61.356(d), (e) and (f)	Maintain engineering design documentation for all control equipment and the closed vent system. Records required for the wastewater treatment system and the design analysis of the carbon adsorption system. Information is retained for the life of the equipment.
61.356(g) and (h)	Maintain records of all visual inspections and the records for all tests of no detectable emissions required by 61.343 through 61.347 and 61.349, along with information regarding repairs.
61.356(i)	Recordkeeping requirements for each treatment process and wastewater treatment system unit operated that complies with 61.348; dates of startup and shutdown of unit; for measurements of benzene concentration, dates of each test and all test results; for process parameters (i.e., flow), maintain description of the operating parameter and unit's design specs and explanation of the criteria used for selection of that parameter; and periods when unit is not operated as designed.



61.356(j)	Maintain documentation regarding the closed vent system and control device (carbon adsorbers); dates and times when breakthrough is measured, when carbon is replaced. Record times when the above is not operated as designed; startups and shutdown of the units.
61.356(l)	Recordkeeping requirements if operating the oil-water separator under the alternative standards of 61.352.
61.356(m)	Recordkeeping requirements if the system used for emission control is maintained at less than atmospheric pressure.

(3) [40 CFR 60, Subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY

The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 60, Subpart VV, including the following sections briefly summarized:

60.482-1(b) and (d)	<i>Standards-General:</i> Compliance is determined by review of records, reports, review of performance test results and inspections. Exemptions for equipment in vacuum service.
60.482-1(e)	Exemption for nominal usage in VOC service.
60.482-3(a) through (g)	<i>Standards-Compressors:</i> Each compressor shall be equipped with a seal system that includes a barrier fluid system. Each barrier fluid system (see 60.482-3(b)&(c)) shall be equipped with a sensor that will detect failure of the seal system, barrier fluid or both, checked daily or equipped with an audible alarm. Determine criterion that indicates failure of the seal system, barrier fluid, or both. If sensor indicates failure of the seal system, barrier system or both, a leak is detected. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
60.482-3(h), (i) and (j)	<i>Standards-Compressors:</i> Exemptions for certain types of compressors meeting specific requirements.
60.482-9(a) through (e)	<i>Standards-Delay of Repair:</i> Delay of repair of equipment with leaks is allowed if repair within 15 days is infeasible without a process shutdown. Requirements for delay of repair of equipment not in VOC service; valves; pumps and beyond a process unit shutdown.
60.486(a)	<i>Recordkeeping Requirements:</i> Combined records for affected facilities.



60.486(b) and (c)	Identification and log for leaks from compressors.
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(4) [OAC rule 3745-21-09(T)] LEAKS FROM PETROLEUM REFINERY EQUIPMENT (PUMP SEALS, PIPELINE VALVES, PROCESS DRAINS, COMPRESSOR SEALS AND PRESSURE RELIEF DEVICES)

a. [OAC 3745-21-09(T)(1)(a)] Except as otherwise indicated in OAC 3745-21-09(T)(1)(b) of this rule, a monitoring program shall be developed and implemented which incorporates the following provisions:

- i. Yearly monitoring of all pump seals, pipeline valves in liquid service and process drains in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code;
- ii. Quarterly monitoring of all compressor seals, pipeline valves in gas service and pressure relief valves in gas service in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code;
- iii. Monthly monitoring of all pump seals by visual methods;
- iv. Monitoring of any pump seal in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code within five working days after any liquids are observed dripping from the seal;
- v. Monitoring of any relief valve in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code within five working days after the valve has vented to the atmosphere; and
- vi. Monitoring of any component in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code within five working days after the repair of a leak.

b. [OAC 3745-21-09(T)(1)(b)] Pressure relief devices which are connected to an operating flare header, vapor recovery devices, valves which are located in pipelines containing kerosene or heavier liquids, storage tank valves and valves which are not externally regulated are exempt from the monitoring requirements contained in OAC 3745-21-09(T)(1)(a) of this rule.

c. [OAC 3745-21-09(T)(1)(c)] For any pipeline or pressure relief valves in gas or liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in OAC 3745-21-09(T)(1)(a) of this rule, as follows:

- i. The valve is designated as difficult to monitor and is monitored each calendar year, provided the following conditions are met:

- (a) Construction of the process unit commenced prior to March 27, 1981;
 - (b) The permittee of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than six feet above a support surface; and
 - (c) The permittee of the valve has a written plan that requires monitoring of the valve at least once per year.
- ii. The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:
 - (a) The permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a quarterly or yearly basis as specified in paragraph a. of this section; and
 - (b) The permittee of the valve adheres to a written plan that requires monitoring of the valve as frequently as practical during process unit turnarounds and other safe to monitor times.
- d. [OAC rule 3745-21-09(T)(1)(d)]
All pipeline valves in gas service and pressure relief valves in gas service shall be clearly marked and identified in such a manner that they will be obvious to both refinery personnel performing monitoring and to the Director.
- e. [OAC rule 3745-21-09(T)(1)(e)]
If a leak is identified as a result of the monitoring program required by OAC3745-21-09(T)(1)(a) of this rule and the concentration of volatile organic compounds exceeds ten thousand parts per million by volume, a tag shall immediately be placed on the leaking component. The tag shall be readily visible and weatherproof; it shall bear an identification number; and it shall clearly indicate the date the leak was detected. The tag shall remain in place until the leaking component is repaired.
- f. [OAC 3745-21-09(T)(f)]
A monitoring log shall be maintained for all leaking components which are tagged in accordance with OAC 3745-21-09(T)(1)(e) of this rule. The monitoring log shall contain, at a minimum, the following data:
 - i. The name of the process unit where the leaking component is located;
 - ii. The type of leaking component (such as valve, seal, or other component);
 - iii. The tag number of the leaking component;
 - iv. The date on which the leaking component was detected;
 - v. The date on which the leaking component was repaired;

- vi. The date and results of the monitoring performed within five working days after the leaking component was repaired;
 - vii. A record of the calibration of the monitoring instrument;
 - viii. A list of those leaking components which cannot be repaired until the next process unit turnaround; and
 - ix. The total number of components monitored and the total number of components found leaking during the calendar year.
- g. [OAC 3745-21-09(T)(1)(g)]
A copy of any monitoring log shall be retained by the permittee for a minimum of five years after the date on which the record was made or the report was prepared.
- h. [OAC 3745-21-09(T)(1)(h)]
A copy of any monitoring log shall immediately be made available to the Director or an authorized representative of the Director, upon verbal or written request, at any reasonable time.
- i. [OAC rule 3745-21-09(T)(2)]
Any permittee of a petroleum refinery shall repair and retest any leaking component, which is tagged and identified in accordance with paragraph b. of this section, as soon as possible but no later than fifteen days after the leak is found unless the leaking component cannot be repaired until a process unit turnaround occurs.
- j. [OAC rule 3745-21-09(T)(3)]
The Director may require a process unit turnaround to occur earlier than the normally scheduled date if the number and severity of leaking components awaiting a turnaround warrant such action. Any such process unit turnaround shall be required by means of an order issued by the Director to the permittee of the petroleum refinery pursuant to division (R) of section 3704.03 of the Ohio Revised Code.
- k. [OAC rule 3745-21-09(T)(4)] ALTERNATIVE MONITORING, RECORDKEEPING AND REPORTING
The Director may accept an alternative monitoring, recordkeeping and reporting program for that required by OAC 3745-21-09(T)(1) of this rule if the permittee of a petroleum refinery can demonstrate to the satisfaction of the Director that the alternative program is at least as effective in identifying, documenting and reporting leaks from petroleum refinery equipment as the program outlined in this permit. For purposes of this paragraph, any proposed alternative program which the Director finds comparable to the requirements of paragraph (DD)(12) or (DD)(13) of OAC rule 3745-21-09 shall be acceptable to the Director.
- (5) The permittee shall maintain the following monthly records:
- a. the wastewater throughput as determined by measured flow rates;

- b. the average benzene, ethylbenzene, toluene and xylene concentrations as determined from measured monthly concentrations (input parameters for U.S. EPA's WATER9 model);
- c. the monthly VOC emissions from each unit (dissolved nitrogen flotation unit and the activated sludge system);
- d. the total hours of operation of each unit; and
- e. the average hourly VOC emission rate from each unit (dissolved nitrogen flotation unit and the activated sludge system).

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

e) Reporting Requirements

(1) [40 CFR 63, Subpart CC] NESHAP From PETROLEUM REFINERIES

The permittee shall submit semiannual reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart CC, including the following sections:

<i>Wastewater Reporting</i>	
63.655(a)	Each permittee subject to the wastewater provisions in 40 CFR Part 63.647 shall comply with the reporting provisions in 40 CFR Part 61.357 of 40 CFR Part 61, Subpart FF. There are no additional reporting requirements for wastewater under this Subpart unless a wastewater stream is included in an emissions average.

(2) [40 CFR 61, Subpart FF] NATIONAL EMISSION STANDARD FOR BENZENE WASTE OPERATIONS

The permittee shall submit annual and quarterly reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 61, Subpart FF, including the following sections:

61.357(d)(2)	For facilities (Toledo Refining Co.) with total annual benzene from facility waste equal to or greater than 10 Mg/yr, submit annually a report that updates the waste stream characteristics based on the information submitted as an initial notification in 61.357(a).
61.357(d)(3)	Reporting requirements for exempt waste streams that comply with 61.342(c)(3)(ii), submitted annually, if applicable.



61.357(d)(4)	Reporting requirements if complying with the alternative requirements of 61.342(d), submitted with those in 61.357(d)(2).
61.357(d)(5)	Required reports if complying with the alternative requirements of 61.342(e), then submit the information in 61.357(d)(5)(i) and (ii).
61.357(d)(6)	Submit quarterly a report that the equipment necessary to comply with these standards has been certified in accordance with 61.357(d)(1) and that the required inspections were carried out.
61.357(d)(7)	If the total annual benzene quantity from facility waste is equal to or greater than 10 Mg/yr (11 ton/yr) (Toledo Refining Co.), then submit quarterly to the Administrator the applicable reports in 61.357(d); i.e., 61.357(d)(7)(i); (d)(7)(ii), (d)(7)(iii), (d)(7)(iv)(D), (d)(7)(iv)(I), and (d)(7)(v).
61.357(d)(8)	Submit annually a report that summarizes all inspections required by 61.342 through 61.354 during which detectable emissions are measured or a problem that resulted in benzene emissions is identified, including information about the repairs and corrective actions.
61.357(e) and (g)	Reporting requirements if complying with the alternative requirements of 61.352 (oil-water separators).

(3) [40 CFR 60, Subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY

The permittee shall submit semiannual reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 60, Subpart VV, including the following sections briefly summarized:

60.487(c)	Submit semiannual reports that includes the content of 60.487(c) for all compressors subject to this regulation.
60.487(d)	If applicable, report if complying with the alternative provisions of 60.483-1 and 60.483-2.

(4) The permittee shall submit deviation (excursion) reports that identify all exceedences of the hourly limitations for VOC for the dissolved nitrogen flotation unit and the activated sludge system.

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

- (5) The permittee shall also submit annual reports that specify the total VOC emissions from the dissolved nitrogen flotation unit and from the activated sludge system for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

- (6) [OAC 3745-21-09(T)] REPORTING REQUIREMENTS FOR PETROLEUM REFINERY EQUIPMENT LEAKS OF VOCs FROM PUMP SEALS, PIPELINE VALVES, PROCESS DRAINS, COMPRESSOR SEALS AND PRESSURE RELIEF DEVICES

[OAC 3745-21-09(T)(1)(i)] A report shall be submitted to the Director by the fifteenth day of January, April, July and October that gives the total number of components monitored during the previous three calendar months, gives the total number of components found leaking during the previous three calendar months, identifies all components which were found leaking during the previous three calendar months but which were not repaired within fifteen days and identifies all leaking components which cannot be repaired until the next process unit turnaround.

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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):

- a. Emission Limitation for the dissolved nitrogen flotation unit:

11.15 lbs/hr and 48.8 tons per year VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations based on the wastewater throughput, as determined by the record keeping in d), and an emission factor of 15.2 kg of VOC (33.5 lbs of VOC) per million gallons of wastewater (U.S. E.P.A. report, "VOC Emissions From Petroleum Refinery Wastewater Systems", dated 1985). An average hourly emission can be determined based on the above stated emission factor times the monthly throughput, and divided by the month's hours of operation from the record keeping requirements in d).

- b. Emission Limitation for the activated sludge system:

5.70 lbs/hr and 24.97 tons per year of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations using the most current version of U.S. EPA's WATER9 software, to determine annual VOC emissions from the activated sludge system along with the record keeping



requirements in d). An average hourly VOC emission rate can be determined by dividing the annual VOC emissions by the hours of operation per year and multiplying by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-718)

- (2) Compliance with 40 CFR Part 63, Subpart CC shall be determined by review of facility records and results from tests and inspections using methods and procedures specified in f)(3) and f)(4).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

- (3) [40 CFR 61, Subpart FF] NATIONAL EMISSION STANDARD FOR BENZENE WASTE OPERATIONS

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

Table with 2 columns: Reference (e.g., 61.342(g)) and Description (e.g., Compliance will be determined by review of facility records and results from tests and inspections using methods and procedures in 61.355).



61.355(e)	Requirements for demonstrating compliance with 61.348(a)(1)(ii) [removing 99% benzene from streams on a mass basis] using performance tests.
61.355(g)	Testing requirements if using performance tests to demonstrate compliance with 61.348(b) [aggregate streams].
61.355(h)	Requirements for testing equipment for compliance with no detectable emissions as required in 40 CFR Part 61.343 through 61.347 and 61.349 by using Method 21 of Appendix A.
61.355(i)	Testing requirements if using a performance test to demonstrate compliance of a control device with either the organic reduction efficiency or benzene reduction efficiency under 61.349(a)(2) [i.e., carbon adsorption].
61.355(j)	Determining the benzene quantity for exempt streams in 61.342(c)(3)(ii)(B) for the allowable 2.0 Mg/yr (2.2 tpy).
61.355(k)	Procedures to determine the benzene quantity for purposes of the calculation required by 61.342(e)(2).

(4) [40 CFR 60, Subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY

The permittee shall comply with the applicable testing requirements required in 40 CFR Part 60, Subpart VV, including the following sections briefly summarized:

60.485(a)	For tests, use the reference methods and procedures in Appendix A of this part, except as provided in 40 CFR 60.8(b).
60.485(b)	Determine compliance with the standards in 60.483, by using Method 21.
60.485(c)	Determining compliance with the no detectable emission standards in 60.482-2(e), 60.482-3(i), 60.482-4, 60.482-7(f) and 60.482-10(e).
60.485(d)	Methods used to test each piece of equipment to demonstrate that the VOC content would never be reasonably expected to exceed 10 percent by weight.

(5) [OAC 3745-21-09(T)] METHOD FOR THE DETECTION OF LEAKS OF VOC COMPOUNDS FROM PETROLEUM REFINERY EQUIPMENT

- a. [OAC 3745-21-10(F)(1)]
This method is applicable to the detection of leaks of volatile organic compounds into the ambient air from petroleum refinery equipment and any chemical manufacturing equipment subject to paragraph (T) or (DD) of OAC rule 3745-21-09 of the Ohio Administrative Code.
 - b. [OAC 3745-21-10(F)(2)]
The detection of leaks shall be determined in accordance with the test procedure set forth in "Method 21, 40 CFR, Part 60, Appendix A."
 - c. [OAC 3745-21-10(F)(3)]
The calibration gases shall be:
 - i. Zero air, which consists of less than ten ppmv of hydrocarbon in air; and
 - ii. A mixture of air and methane or n-hexane at a concentration of approximately, but less than, ten thousand ppmv of methane or n-hexane.
 - d. [OAC 3745-21-10(F)(4)]
The leak detection instrument shall be calibrated before use on each day of its use.
- g) Miscellaneous Requirements
- (1) None.



2. T146, Tank 11007

Operations, Property and/or Equipment Description:

Tank 11007 - 357,000 gallon internal floating roof storage tank with a single, mechanical shoe seal storing oily sludge (API sludge)

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) (PTI 04-717 issued 12/4/1991 and modified on 10/1/1993)	2.94 tpy of volatile organic compounds (VOC)
b	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 6 of 40 CFR Part 63, Subpart CC "General Provisions Applicability to Subpart CC" provides applicability provisions, definitions, and other general provisions of 40 CFR Part 63, Subpart A that are applicable to this emissions unit.
c.	40 CFR Part 63, Subpart CC (40 CFR 63.640-656) [In accordance with 40 CFR 63.640(a), 63.640(c)(3) and 63.641, this emissions unit is subject to Subpart CC as a petroleum refining process unit located at a plant site that is a major source as defined in section 112(a) of the Clean Air Act; subject to the emission limitations/control measures specified in this section and meets the definition of a tank storing a Group 1 wastewater	In accordance with 63.647(a) and 63.655(a), the permittee of a wastewater storage tank subject to 40 CFR Part 63, Subpart CC, shall comply with the requirements of 61.340 through 61.357 of 40 CFR 61, Subpart FF. Pursuant to 40 CFR Part 61.351 of subpart FF, as an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	stream as defined in 63.641.]	60.112b(a)(1) of Subpart Kb See b)(2)a. and b)(2)b.
d.	40 CFR Part 60, Subpart Kb (60.110b-117b) [In accordance with 40 CFR 60.110b(a), this emissions unit is an affected facility to which this subpart applies. It is a storage vessel with a capacity greater than or equal to 75 cubic meters (m ³) used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984, subject to the emission limitations/control measures specified in this section.]	See b)(2)b.
e.	OAC rule 3745-21-09(L)	See b)(2)c.

(2) Additional Terms and Conditions

a. [63.647(a)] WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC

The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream.

b. [60.112b(a)(1)] 40 CFR Part 60, Subpart Kb

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and

refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. TWO LLC uses a mechanical shoe as the primary seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- c. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.
- c) Operational Restrictions
- (1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES

The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 63, Subpart CC, including the following sections:

63.642(e)	<i>General Standards:</i> Requirements for keeping all applicable reports and records required by this subpart for at least 5 years except as otherwise specified in this permit and be readily accessed within 24 hours.
63.655(a)	<i>Recordkeeping Requirements:</i> Comply with the waste water storage vessel recordkeeping provisions specified in 61.356 of Subpart FF.
<i>Recordkeeping requirements from 40 CFR 61, Subpart FF</i>	
CFR 61.356(k)	e permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the recordkeeping requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb subject to control measures specified in this section.

(2) [40 CFR 60, Subpart Kb] – STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS, AFTER July 23, 1984

The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 60, subpart Kb, including the following sections:

<i>60.113b – Required Inspections from Testing and Procedures</i>	
60.113b(a)(1)	<i>Inspections prior to filling the tank:</i> Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, then repair the items before filling the storage vessel.
60.113b(a)(2)	<i>Annual Inspections:</i> For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, then repair the items or empty and remove the



	storage vessel from service within 45 days. If a failure that is detected during inspections and cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR Part 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
60.113b(a)(3)	For vessels equipped with a double-seal system as specified in 40 CFR Part 60.112b(a)(1)(ii)(B): - visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(4) at least every 5 years; or -visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(2).
60.113b(a)(4)	<i>Inspections when tank is emptied and degassed:</i> Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that None of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR Part 60.113b(a)(2).
60.115 Recordkeeping Requirements	
60.115b(a)(2)	Keep a record of each inspection performed as required by 40 CFR Part 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).



- (3) The permittee shall maintain a record of the following:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L)(3))

- (4) The permittee shall maintain the following records:
 - a. the annual throughput of each stored material; and
 - b. the estimated annual VOC emissions for all of the stored materials.

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

e) Reporting Requirements

- (1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES
The permittee shall submit semiannual reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart CC, including the following sections:

63.655(a)	<i>Reporting Requirements:</i> Comply with the storage vessel reporting provisions specified in 61.357 of Subpart FF.
<i>Reporting requirements from 40 CFR 61, Subpart FF</i>	
40 CFR 61.357(f)	The permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the reporting requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb.

- (2) [40 CFR 60, Subpart Kb] – STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS, AFTER July 23, 1984

The permittee shall submit the following reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(2)	Notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in 60.113(a)(2) that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon
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	as possible
60.113b(a)(5)	Notification requirements 30 days prior to filling or re-filling the tank.
<i>60.115b Reporting Requirements</i>	
60.115b(a)(3)	If any of the conditions described in 40 CFR Part 60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
60.115b(a)(4)	After each inspection required by 40 CFR Part 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR Part 60.113b(a)(3)(ii), a report shall be furnished to TES within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR Part 60.112b(a)(1) or 40 CFR Part 60.113b(a)(3) and list each repair made.

- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year through the Air Services component of the Ohio EPA's eBusiness Center.

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

f) Testing Requirements

- (1) Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in d).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

- (2) Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

2.94 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the most current version of U.S. EPA's WATER9 software, and the actual annual



throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in d).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -Equalization tanks T143, T144, T145 (tanks 11001, 11002 and 11003)

EU ID	Operations, Property and/or Equipment Description
T143	Tank 11001 - Equalization Tank 1: 67,130 BBL (2,819,460 gallons) internal floating roof storage tank with a single seal – spring loaded
T144	Tank 11002 - Equalization Tank 2: 67,130 BBL (2,819,460 gallons) internal floating roof storage tank with a single seal – spring loaded
T145	Tank 11003 - Equalization Tank 3: 67,130 BBL (2,819,460 gallons) internal floating roof storage tank with a dual seals – primary seal is liquid-mounted, resilient foam-filled and secondary seal is rim-mounted, flexible wiper

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) (PTI 04-717 issued 12/4/1991 and modified on 10/1/1993)	1.65 tons per year of volatile organic compounds (VOC)
b	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 6 of 40 CFR Part 63, Subpart CC "General Provisions Applicability to Subpart CC" provides applicability provisions, definitions, and other general provisions of 40 CFR Part 63, Subpart A that are applicable to this emissions unit.
c.	40 CFR Part 63, Subpart CC (40 CFR 63.640-656) [In accordance with 40 CFR 63.640(a), 63.640(c)(3) and 63.641, this emissions unit is subject to	In accordance with 63.647(a) and 63.655(a), the permittee of a wastewater storage tank subject to 40 CFR Part 63, Subpart CC, shall comply with the requirements of 61.340 through 61.357 of

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Subpart CC as a petroleum refining process unit located at a plant site that is a major source as defined in section 112(a) of the Clean Air Act; subject to the emission limitations/control measures specified in this section and meets the definition of a tank storing a Group 1 wastewater stream as defined in 63.641.]	40 CFR 61, Subpart FF. Pursuant to 40 CFR Part 61.351 of subpart FF, as an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb See b)(2)a. and b)(2)b.
d.	40 CFR Part 60, Subpart Kb (60.110b-117b) [In accordance with 40 CFR 60.110b(a), this emissions unit is an affected facility to which this subpart applies. It is a storage vessel with a capacity greater than or equal to 75 cubic meters (m ³) used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984, subject to the emission limitations/control measures specified in this section.]	See b)(2)b.
e.	OAC rule 3745-21-09(L)	See b)(2)c.

(2) Additional Terms and Conditions

a. [63.647(a)] WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC

The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream.

b. [60.112b(a)(1)] 40 CFR Part 60, Subpart Kb

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

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- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. TWO LLC uses a mechanical shoe as the primary seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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- c. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES
The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 63, Subpart CC, including the following sections:

63.642(e)	<i>General Standards:</i> Requirements for keeping all applicable reports and records required by this subpart for at least 5 years except as otherwise specified in this permit and be readily accessed within 24 hours.
63.655(a)	<i>Recordkeeping Requirements:</i> Comply with the waste water storage vessel recordkeeping provisions specified in 61.356 of Subpart FF.
<i>Recordkeeping requirements from 40 CFR 61, Subpart FF</i>	
40 CFR 61.356(k)	The permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the recordkeeping requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb.

- (2) [40 CFR 60, Subpart Kb] – STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS, AFTER July 23, 1984
The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 60, subpart Kb, including the following sections:

<i>60.113b – Required Inspections from Testing and Procedures</i>	
60.113b(a)(1)	<i>Inspections prior to filling the tank:</i> Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, then repair the items before filling the storage vessel.
60.113b(a)(2)	<i>Annual Inspections:</i> For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof

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	<p>at least once every 12 months after initial fill.</p> <p>If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, then repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections and cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR Part 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.</p>
60.113b(a)(3)	<p>For vessels equipped with a double-seal system as specified in 40 CFR Part 60.112b(a)(1)(ii)(B):</p> <ul style="list-style-type: none">- visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(4) at least every 5 years; or-visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(2).
60.113b(a)(4)	<p><i>Inspections when tank is emptied and degassed:</i> Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that None of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR Part 60.113b(a)(2).</p>
<p><i>60.115 Recordkeeping Requirements</i></p>	

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60.115b(a)(2)	Keep a record of each inspection performed as required by 40 CFR Part 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
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(3) The permittee shall maintain a record of the following:

- a. the volatile organic liquid stored; and
- b. the maximum true vapor pressure of that volatile organic liquid during the respective storage period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

(4) The permittee shall maintain the following records:

- a. the annual throughput of each stored material; and
- b. the estimated annual VOC emissions for all of the stored materials.

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

e) Reporting Requirements

(1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES
The permittee shall submit semiannual reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart CC, including the following sections:

63.655(a)	<i>Reporting Requirements:</i> Comply with the storage vessel reporting provisions specified in 61.357 of Subpart FF.
<i>Reporting requirements from 40 CFR 61, Subpart FF</i>	
40 CFR 61.357(f)	The permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the reporting requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb.

(2) [40 CFR 60, Subpart Kb] – STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS, AFTER July 23, 1984
The permittee shall submit the following reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 60, Subpart Kb, including the following sections:

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60.113b(a)(2)	Notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in 60.113(a)(2) that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible
60.113b(a)(5)	Notification requirements prior to filling or re-filling the tank.
<i>60.115b Reporting Requirements</i>	
60.115b(a)(3)	If any of the conditions described in 40 CFR Part 60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
60.115b(a)(4)	After each inspection required by 40 CFR Part 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR Part 60.113b(a)(3)(ii), a report shall be furnished to TES within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR Part 60.112b(a)(1) or 40 CFR Part 60.113b(a)(3) and list each repair made.

- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year through the Air Services component of the Ohio EPA's eBusiness Center.

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

f) Testing Requirements

- (1) Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in d).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

- (2) Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emission Limitation (each tank):

1.65 tons per year of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the most current version of U.S. EPA's WATER9 software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in d).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Tanks T105,T106,T108 (Tanks 11011, 11010 and 11009)

EU ID	Operations, Property and/or Equipment Description
T105	Tank 11011 - Oily sludge tank (DNF Floats): internal floating roof storage tank with a capacity of 8,843 BBL (371,406 gallons); single seal - liquid mounted, resilient foam
T106	Tank 11010 - Slop Oil Tank: internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons); single seal - liquid mounted, resilient foam
T108	Tank 11009 - Slop Oil Tank: internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons); single seal - liquid mounted, resilient foam

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.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 6 of 40 CFR Part 63, Subpart CC "General Provisions Applicability to Subpart CC" provides applicability provisions, definitions, and other general provisions of 40 CFR Part 63, Subpart A that are applicable to this emissions unit.
b.	40 CFR Part 63, Subpart CC (40 CFR 63.640-656) [In accordance with 40 CFR 63.640(a), 63.640(c)(3) and 63.641, this emissions unit is subject to Subpart CC as a petroleum refining process unit located at a plant site that is a major source as defined in section 112(a) of the Clean Air Act; subject to the emission limitations/control measures specified in this	In accordance with 63.647(a) and 63.655(a), the permittee of a wastewater storage tank subject to 40 CFR Part 63, Subpart CC, shall comply with the requirements of 61.340 through 61.357 of 40 CFR 61, Subpart FF. Pursuant to 40 CFR Part 61.351 of subpart FF, as an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	section and meets the definition of a tank storing a Group 1 wastewater stream as defined in 63.641.]	meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb See b)(2)a. and b)(2)b.
c.	OAC rule 3745-21-09(L)	See b)(2)c.

(2) Additional Terms and Conditions

a. [63.647(a)] WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC

The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream.

b. [60.112b(a)(1)] 40 CFR Part 60, Subpart Kb

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. TWO LLC uses a mechanical shoe as the primary seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

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- v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- c. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES
The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 63, Subpart CC, including the following sections:

63.642(e)	<i>General Standards:</i> Requirements for keeping all applicable reports and records required by this subpart for at least 5 years except as otherwise specified in this permit and be readily accessed within 24 hours.
63.655(a)	<i>Recordkeeping Requirements:</i> Comply with the waste water storage vessel recordkeeping provisions specified in 61.356 of Subpart FF.

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<i>Recordkeeping requirements from 40 CFR Part 61, Subpart FF</i>	
40 CFR 61.356(k)	The permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the recordkeeping requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb.
<i>Monitoring and Recordkeeping Requirements from 40 CFR Part 60, Subpart Kb</i>	
<i>60.113b – Required Inspections from Testing and Procedures</i>	
60.113b(a)(1)	<i>Inspections prior to filling the tank:</i> Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, then repair the items before filling the storage vessel.
60.113b(a)(2)	<i>Annual Inspections:</i> For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, then repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections and cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR Part 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
60.113b(a)(3)	For vessels equipped with a double-seal system as specified in 40 CFR Part 60.112b(a)(1)(ii)(B): - visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(4) at least every 5 years; or -visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(2).
60.113b(a)(4)	<i>Inspections when tank is emptied and degassed:</i> Visually inspect the internal floating roof, the primary seal, the secondary

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	seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that None of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR Part 60.113b(a)(2).
<i>60.115 Recordkeeping Requirements</i>	
60.115b(a)(2)	Keep a record of each inspection performed as required by 40 CFR Part 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

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

- a. the types of petroleum liquids stored in the tank; and
- b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L)(3))

e) Reporting Requirements

(1) [40 CFR 63, Subpart CC] NESHAP FROM PETROLEUM REFINERIES

The permittee shall submit semiannual reports and other such notifications and reports via the Air Services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart CC, including the following sections:

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63.655(a)	<i>Reporting Requirements:</i> Comply with the storage vessel reporting provisions specified in 61.357 of Subpart FF.
<i>Reporting requirements from 40 CFR Part 61, Subpart FF</i>	
40 CFR 61.357(f)	The permittee who elects the alternative to the standards for tanks specified in 61.351 of Subpart FF shall comply with the reporting requirements in 40 CFR 60.115b of 40 CFR 60, Subpart Kb.
<i>Reporting requirements from 40 CFR Part 60, Subpart Kb</i>	
<i>60.113b Notifications</i>	
60.113b(a)(2)	Notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in 60.113(a)(2) that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible
60.113b(a)(5)	Notification requirements 30 days prior to filling or re-filling the tank.
<i>60.115b Reporting Requirements</i>	
60.115b(a)(3)	If any of the conditions described in 40 CFR Part 60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
60.115b(a)(4)	After each inspection required by 40 CFR Part 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR Part 60.113b(a)(3)(ii), a report shall be furnished to TES within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR Part 60.112b(a)(1) or 40 CFR Part 60.113b(a)(3) and list each repair made.

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f) Testing Requirements

- (1) Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in d).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

g) Miscellaneous Requirements

- (1) None.