



Environmental Protection Agency

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

3/5/2012

Certified Mail

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0302020012
Permit Number: P0109018
Permit Type: Initial Installation
County: Allen

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

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



Response to Comments

Facility ID:	0302020012
Facility Name:	Lima Refining Company
Facility Description:	Petroleum Refinery and Storage
Facility Address:	1150 South Metcalf Street Lima, OH 45804 Allen County
Permit:	P0109018, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 01/11/2012. The comment period ended on 02/10/2012.	
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: Storage Tanks – Ohio SIP not approved

- a. Comment: U.S. EPA Region V sent e-mail to DAPC/NWDO on 1/31/12 with the following comment:

"The Permit Strategy Write-Up states "All new coagulant, polymer and sulfuric chemical bulk storage tanks installed for this project are exempt from PTI requirements due to type of material stored or tank capacities below thresholds in OAC rule 3745-31-03." Could you elaborate on which 03 exemption is being applied? If it's the one for organic liquid storage tanks, note that this exemption has not yet been approved into the SIP.

- b. Response: Five storage tanks were added to the permit, since each has a capacity greater than 10,000 gallons which is the exemption threshold in the most recently approved 2001 Ohio SIP. These tanks are T275 through T279 and were set-up as an emissions group. All of the remaining tanks have capacities less than 10,000 gallons and are exempt from permitting.

2. Topic: Project netting is not necessary/nor allowed

- a. Comment: U.S. EPA Region V sent e-mail to DAPC/NWDO on 1/31/12 with the following comment:

Project netting is being used here. Please note that project netting is not permitted under current NSR Rules. For reference, please refer to March 30, 2010 HOVENSA letter:

<http://www.epa.gov/region07/air/nsr/nsrmemos/stp1net.pdf>

- b. Response: DAPC/NWDO discussed this, and determined that this is not a netting permit, nor a synthetic minor. The netting box was inadvertently checked in STARS2, it is now unchecked.

In addition, the permit strategy write up was changed to documentation of emissions reductions only to simply show the emissions reductions that will occur with this project. A statement was included with emissions unit P048 with this same information.



FINAL

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

Facility ID:	0302020012
Permit Number:	P0109018
Permit Type:	Initial Installation
Issued:	3/5/2012
Effective:	3/5/2012



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

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Authorization

Facility ID: 0302020012
Facility Description: Petroleum Refinery and Storage
Application Number(s): A0042990, A0043836
Permit Number: P0109018
Permit Description: Wastewater Oil/Water Separations System upgrade to increase mechanical reliability, provide consistent effluent treatment and improve environmental and safety performance.
Permit Type: Initial Installation
Permit Fee: \$1,750.00
Issue Date: 3/5/2012
Effective Date: 3/5/2012

This document constitutes issuance to:

Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

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

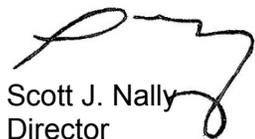
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109018
Permit Description: Wastewater Oil/Water Separations System upgrade to increase mechanical reliability, provide consistent effluent treatment and improve environmental and safety performance.

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

- Emissions Unit ID: P048**
Company Equipment ID: PRs 190786, 190790, 190794, 190798, 190801
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T275**
Company Equipment ID: Tank 152 (PR-100152)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T276**
Company Equipment ID: Tank 153 (PR-100153)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T277**
Company Equipment ID: Tank 154 (PR-100154)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T278**
Company Equipment ID: Tank 155 (PR-100155)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T279**
Company Equipment ID: Tank 156 (PR-100156)
Superseded Permit Number:
General Permit Category and Type: Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, and (ii) operational restrictions.

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All

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

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P048, Wastewater Treatment Plant

Operations, Property and/or Equipment Description:

6,000 gallons per minute capacity Oil/Water Separator System including three API separators (PR-190786, PR-190790 and PR-190794); In Ground Lift Station (PR-190785), Two Dissolved Nitrogen Flotation Units (PR-190798 and PR-190801); and the following exempt storage vessels:

Description	Capacity (gallons)	Exempt by:
Flow splitter tank (PR-100133)	3,525	OAC rule 3745-31-03(A)(1)(I)(iv) – less than 19,815 gallons with submerged fill
Coagulation tank A (PR-100157)	940	OAC rule 3745-31-03(A)(1)(I)(iv) – less than 19,815 gallons with submerged fill
Coagulation tank B (PR-100159)	878	OAC rule 3745-31-03(A)(1)(I)(iv) – less than 19,815 gallons with submerged fill
Air dissolution standpipe A (PR-190804)	92.4	OAC rule 3745-31-03(A)(1)(I)(iii) – less than 700 gallons
Air dissolution standpipe B (PR-190805)	92.4	OAC rule 3745-31-03(A)(1)(I)(iii) – less than 700 gallons
Sludge standpipe A (PR-100158)	350	OAC rule 3745-31-03(A)(1)(I)(iii) – less than 700 gallons
Sludge standpipe B (PR-100600)	350	OAC rule 3745-31-03(A)(1)(I)(iii) – less than 700 gallons
Coagulant storage tank (PR-100630)	6,150	OAC rule 3745-31-03(A)(1)(I)(i) – inorganic liquid
Polymer storage tank (PR-100164)	2,250	OAC rule 3745-31-03(A)(1)(I)(i) – inorganic liquid

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(D)	9.79 tons volatile organic compounds (VOC)/yr from inlet lift station 6.98 tons VOC/yr from fugitive emissions associated with leak detection and repair (LDAR) from wastewater operations for this emissions unit See b)(2)a.
b.	ORC 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-21-09(M)(2)	See b)(2)c.
d.	40 CFR, Part 60, Subpart GGGa	See b)(2)d.
e.	40 CFR, Part 60, Subpart QQQ	See b)(2)e.
f.	40 CFR, Part 60, Subpart A	See 40 CFR 60.1 through 60.19
g.	40 CFR, Part 61, Subpart FF	See b)(2)f.
h.	40 CFR, Part 61, Subpart A	See 40 CFR 61.01 through 61.19
i.	40 CFR, Part 63, Subpart CC	See b)(2)d. and b)(2)g.
j.	40 CFR, Part 63, Subpart A	Table 6 to 40 CFR, Part 63, Subpart CC – Applicability of General Provisions to Subpart CC shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purposes of limiting potential to emit (PTE). The limitations on PTE result in actual emission reductions and the establishment of creditable emission decreases which may be applied towards contemporaneous emission changes associated with the applicability of Prevention of Significant Deterioration requirements.
 - i. 9.79 tons VOC/yr from inlet lift station; and
 - ii. 6.98 tons VOC/yr from fugitive emissions associated with LDAR from wastewater operations for this emissions unit.
- b. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
- c. Except for any wastewater separator which is used solely for once-through, noncontact cooling water or for intermittent tank farm drainage resulting from accumulated precipitation, the permittee shall control the emissions of volatile organic compounds from any wastewater separator no later than the date specified in paragraph (C)(13) of OAC rule 3745-21-04 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.

- d. This emissions unit is subject to the appropriate provisions of 40 CFR, Part 60, Subpart GGGa (Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006; and 40 CFR, Part 63, Subpart CC (Petroleum Refinery MACT Standards).

The requirements of these rules are equivalent to or less stringent than the alternative leak detection and repair (LDAR) monitoring plan submitted by the permittee, pursuant to OAC rule 3745-21-09(T)(4) and 40 CFR, Part 63, Subpart CC. Terms and conditions for the alternative LDAR plan are listed in section B.2 of the Facility-Wide Terms and Conditions of the facility's Title V renewal permit.

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

40 CFR 60.692-2	Standards: Individual drain systems
40 CFR 60.692-3	Standards: Oil-water separators
40 CFR 60.693-1	Alternative standards for individual drain systems

- f. During all times when the gaseous waste stream from this emissions unit is routed to the refinery fuel gas system, the gaseous waste stream is exempt from 40 CFR, Part 61, Subpart FF, per 40 CFR 61.340(d). In accordance with 40 CFR 61.340(d), during these times, no testing, monitoring, recordkeeping or reporting is required under this subpart for the gaseous waste stream from this emissions unit.

In addition, all equipment located downstream of the inlet lift station which contacts the wastewater and is subject to 40 CFR, Part 61, Subpart FF is controlled by a nitrogen blanket routed to the refinery fuel gas system by the NESHAPS gas compressor system, and is thus, exempt from testing, monitoring, recordkeeping and reporting requirements of 40 CFR, Part 61, Subpart FF.

Note: on a facility-wide basis for benzene containing wastestreams, the permittee complies with 40 CFR, Part 61, Subpart FF by use of 40 CFR 61.342(e)(2) – annual benzene quantity equal to or less than 6 megagrams (6 metric tons) for water streams containing greater than or equal to 10%.

- g. The permittee shall comply with the applicable standards under 40 CFR, Part 63, Subpart CC, including the following sections:

40 CFR 63.640(d)(5)	Operate closed vent to the refinery fuel gas system for API separators, DNF system, flow splitter tank, coagulation
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	tanks, air dissolution standpipes and sludge standpipes.
40 CFR 63.647(a) – for the API Lift Station only	Except as provided in paragraph (b) of this section, each permittee of a Group 1 wastewater stream shall comply with the requirements of 40 CFR 61.340 through 61.355 of 40 CFR, Part 61, subpart FF for each process wastewater stream that meets the definition in 40 CFR 63.641.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

9.79 tons VOC/yr from inlet lift station

Applicable Compliance Method

The annual emission limitation was derived from Water9® computer program, and represents the potential to emit for the inlet lift station. The permittee shall use this computer program to demonstrate compliance with the emission limitation.

b. Emission Limitation

6.98 tons VOC/yr from fugitive emissions associated with LDAR from wastewater operations for this emissions unit

Applicable Compliance Method

Compliance with the annual limitation shall be demonstrated by use of the U.S. EPA Protocol Document for Equipment Leaks (EPA-453/R-95-017, November 1995) – emission factors from Tables 2-2, 2-10 and 2-12. The emissions are

based on the following approximate number of new LDAR components for this project:

Valves: 500 in vapor service, 500 in light liquid service

Pumps: 25 in light liquid service

Connectors/Flanges: 500 in vapor service, 500 in light liquid service

Heavy Liquid Components: 250 valves, 25 pumps, 250 connectors

Pressure Relief Valves: 50 in gas service

Sampling Connectors: 30 in gas service

Compressors: 10 in gas service

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group - Fixed Roof Storage Tank Group

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T275	above ground, fixed roof flow equalization storage tank A - No. 100152 with a capacity of 10,150 gallons
T276	above ground, fixed roof flow equalization storage tank B - No. 100153 with a capacity of 10,150 gallons
T277	above ground, fixed roof flow equalization storage tank C - No. 100154 with a capacity of 10,150 gallons
T278	above ground, fixed roof west skimmed oil transfer storage tank - No. 100155 with a capacity of 11,092 gallons
T279	above ground, fixed roof east skimmed oil transfer storage tank - No. 100156 with a capacity of 11,092 gallons

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 3745-21-09(L)	None [See b)(2)a.]
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)d.
d.	40 CFR, Part 60, Subpart Kb	None [See b)(2)e.]
e.	40 CFR, Part 60, Subpart QQQ	See b)(2)f.
f.	40 CFR, Part 60, Subpart A	See 40 CFR 60.1 through 60.19
g.	40 CFR, Part 63, Subpart CC	See b)(2)g.

h.	40 CFR 63.1 through 63.15	Table 6 of 40 CFR, Part 63, Subpart CC – Applicability of General Provisions to Subpart CC shows which parts of the General Provisions in 40 CFR 63.1 – 63.145 apply.
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(2) Additional Terms and Conditions

- a. The requirements of this rule are not applicable since each storage tank has a fixed roof with capacity less than 40,000 gallons.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- c. The BAT requirements under OAC rule 3745-31-05(A)(3) have been determined to be use of a closed loop system from each storage tank with all vapors routed to the refinery fuel gas system. No emissions limitations were established because the volatile organic compound emissions are negligible by use of the closed vent system.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- e. The requirements of this rule are not applicable since the capacity of each storage tank is less than 19,815 gallons.
- f. The requirements in 40 CFR 60.691 and 60.692-3 are applicable to emissions units T278 and T279. The permittee shall comply with these requirements by use of a fixed roof tank with closed vent to the refinery fuel gas system and use of the NESHAPS gas compressor system.
- g. The requirements in 40 CFR 63.640(d)(5) are applicable to emissions units T275, T276, T277, T278 and T279. The permittee shall comply with these requirements by use of a fixed roof tank with closed vent to the refinery fuel gas system and use of the NESHAPS gas compressor system.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.