



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Re: Permit to Install
Stark County
Application No: 15-649
NSPS
TOXIC REVIEW

CERTIFIED MAIL

October 9, 1991

ASHLAND PETROLEUM COMPANY
THOMAS H. WIGGLESWORTH
P. O. BOX 8170
CANTON, OH 44711

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 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. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Application No. 15-649
APS Premise No. 1576000301
Permit Fee: \$585.00

Name of Facility: ASHLAND PETROLEUM COMPANY

Person to Contact: THOMAS H. WIGGLESWORTH

Address: P. O. BOX 8170
CANTON, OH 44711

Location of proposed source(s): 2408 GAMBRINUS ROAD SW
CANTON TWP, OHIO

Description of proposed source(s):
SULFUR RECOVERY UNIT.

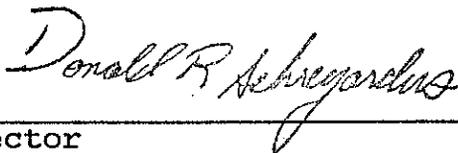
Date of Issuance: October 9, 1991

Effective Date: October 9, 1991

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(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 source(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



Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a \$15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ASHLAND PETROLEUM COMPANY located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
P016	Sulfur Recovery Unit	See Terms and Conditions	3745-31-05 3745-18-06 40 CFR Part 60 Subpart J	See Terms and Conditions 250ppm 8.66 lbs/hr SO₂ ..5 lb/hr OC

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
SO ₂	37.9*
OC ²	2.2**

*Due to the limiting capacity of the SCOT unit servicing this SRU and the existing SRU the maximum increase of SO₂ will be 30.74 tons/year.

**This is the increased OC emissions from the new SRU from fugitive emissions (values and flanges).

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P016	Sulfur Recovery Unit	J

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Permit Management Unit
P.O. Box 1049
Columbus, OH 43266-0149

and Division of Air Pollution Control
Canton City Health Department
Third Floor, City Hall
218 Cleveland Ave., S.W.
Canton, OH 44702

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

3. Tests shall be performed for the following sources and pollutants:

<u>Source</u>	<u>Pollutant(s)</u>
P016	SO ₂

MONITORING REQUIREMENTS

An SO₂ and O₂ monitor shall be installed on the P011. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of sulfur dioxide values in excess of the limitations specified in OAC Rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

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In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 218 Cleveland Ave. SW, 3rd Floor, City Hall, Canton, Ohio 44702.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. For six months after the startup of this second SRU, Ashland shall submit the following reports on a monthly basis:
 - a. Document all monitored sulfur dioxide values in excess of 250 ppm. This report will also cite all malfunctions of the CEM equipment that monitors the SO₂ discharged from the SRU/SCOT Unit.
 - b. If during any calendar month, the total monitored excess emissions of sulfur dioxide from source P011 exceed the allowable emission levels for more than 5% of the time during which the source and monitor are operating simultaneously, Ashland shall submit, in detail, the following additional information:
 - i. The cause(s) for the exceedence(s); and
 - ii. The corrective action which has been and/or will be taken by Ashland to eliminate the cause(s) for the exceedence(s).
 - c. A monthly production report of elemental sulfur produced.
 - d. A dated list of all H₂S venting occurrences through the flare system. A report shall note the date, time, duration of H₂S flaring, probable cause of the H₂S flaring, steps taken to correct the concentration and volume of H₂S going to the flare, and tons of SO₂ discharged during the H₂S flaring.

These reports may be combined into a single report. These reports shall be submitted by not later than the 15th of each month and shall address the data during the previous calendar month.

These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, City Hall Building, 218 Cleveland Avenue SW, Canton, Ohio 44702 and to the Ohio EPA.

2. At the end of six months following the startup of this second SRU, monthly reporting will cease. Ashland will submit a quarterly report by February 15, May 15, August 15, and November 15 of each year which will cover the previous calendar quarter and include the following information.

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- a. A quarterly excess emissions report as outlined in 1a above; a sulfur production report as outlined in 1c above; and an H₂S venting report as outlined in 1d above.
 - b. These reports may be combined into a single report.
 - c. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, City Hall Building, 218 Cleveland Avenue SW, Canton, Ohio 44702 and to the Ohio EPA.
3. Ashland shall install flow measuring devices to be used for quantification of emissions routed from the SRU to the flare. Subsequently, the data collected beginning with activation of the relief valve until the release is over, shall be quantified and submitted to the Canton LAA and the Ohio EPA as part of the excess emissions report.

Ashland shall install and maintain an alarm system on the SRU which will immediately notify plant operators when a hydrogen sulfide (H₂S) venting situation develops. When an H₂S venting situation has been noted, the operator is to immediately notify the shift supervisor. Shift supervisors, once advised of an H₂S venting situation, are to take immediate steps to minimize or eliminate the venting. Whenever an H₂S venting situation develops, a supervisor on duty shall notify the Canton LAA by telephone as soon as possible. If the Canton LAA is closed when the H₂S venting condition develops, then the Canton LAA will be notified at the first opportunity during normal business hours. In addition, if the venting is considered a health risk, the shift supervisor on duty shall call the Ohio EPA Emergency Response number (1-800-282-9378) and shall advise that organization of the H₂S venting situation.

4. The standards of performance for this source, having an incinerated gas stream will not discharge more than 250 ppm by volume of sulfur dioxide (SO₂) corrected to a dry oxygen-free basis as prescribed under 40 CFR Part 60, Subpart J.
5. This source shall have an oxygen (O₂) monitoring device which will be used to correct the sulfur dioxide CEM data to an oxygen-free basis. CEM maintenance requirements for the sulfur dioxide and oxygen CEM system will follow the procedures cited under 40 CFR Part 60, Subpart J.

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6. Pursuant to the requirements of NSPS, Subpart J, Ashland shall continuously monitor and record the concentration of sulfur dioxide discharged from the SRU Unit--thermal oxidizer. Section 60.13(e) of these standards requires that such continuous monitoring and recording equipment be in continuous operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.
7. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, Ashland shall continuously monitor and record by a device which provides an instantaneous readout of the temperature of the thermal oxidizer in order to ensure total sulfur oxidation to sulfur dioxide (SO₂).
8. Ashland shall conduct and document a monthly pressure survey of the SRU.
9. Ashland shall comply with all of the provisions of their preventive maintenance and malfunction abatement plan and their quality assurance program for the continuous emissions monitoring system.