



Environmental Protection Agency

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

3/15/2012

Certified Mail

Bill Rupert
BP-Husky Refining LLC
4001 Cedar Point Road
P.O. Box 696
Oregon, OH 43697

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448020007
Permit Number: P0108950
Permit Type: OAC Chapter 3745-31 Modification
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
TDES; Michigan; Indiana; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

BP-Husky Refining LLC (BP-Husky) Toledo Refinery is proposing to install a new recycle compressor in the B-Gas Oil Hydrotreater (BGOT) process unit (P029). BP proposes this project to replace the existing compressor in the unit with a new, larger, compressor and to allow for more compression of recycled gas and improved hydrotreatment of the gas oil.

In addition to the compressor, BP-Husky proposes to install a new amine contactor with a larger diameter to replace the existing one and install a new recycle gas knock-out drum to prevent entrained liquid from entering the compressor. BP-Husky proposes to replace the existing cold high pressure separator with a new drum to accommodate the higher flow of gas.

BP-Husky proposes to add a new tie-in to the existing oily water sewer drain system, and some relief valves that vent to the flare will be relocated to a different location in the flare header, and a new compressor seal tie-in to the plant flare system.

Although other emission sources will not be modified, this project could result in slightly higher BGOT unit feed rates, then there could be a slight increase in emissions for a few additional sources. The project emissions shown in the below table conservatively assume this possibility and include increased firing/emissions from the BGOT feed heaters (B030 and B033), increased crude heater utilization of the Crude heaters (B015/B019), and a slight increase throughput/emissions from crude tankage, gasoline tankage and the oily water sewer.

There will be insignificant net emissions increase resulting from the proposed modification to the unit. This PTI reflects the GGGa applicability to P029 which is triggered by the proposed project and a slightly increased allowable fugitive emissions limit for this unit.

3. Facility Emissions and Attainment Status:

Table with 3 columns: Pollutant (PM10, SO2, VOC, NOx), Standard (25 TPY, 40 TPY, 40 TPY, 40 TPY), and Status (Unclassifiable Attainment, non-attainment, unclassifiable/attainment).



4. Source Emissions:

Emissions Increase for the Project (Tons per yr)

Emissions Unit	NOx	SO2	PM10/2,5	CO	VOC	H2SO4	HAPs	GHG (CO2e)
P029	na	na	na	na	2.96	na	0.30	
B030	6.32	5.62	0.41	4.57	0.30			6,767
B033		9.48	1.09	12.01	0.79			17,745
B015/B019	7.88	1.79	0.29	3.25	0.21			4,796
Increased Crude Tank use					0.38			
Increased Gasoline Tank use					0.22			
Increased sewer use					0.72			
Project Total Increase	14.21	16.88	1.79	19.83	5.58	na		29,308
PSD/NSR Significance Levels	40	40	15	100	40	7		75,000
Above Significance Levels	No	No	No	No	No	No		No

5. Conclusion:

The net emission increase associated with this Permit to Install will not result in a significant net emissions increase, and is, therefore, not subject to PSD review.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	22.08

PUBLIC NOTICE
3/15/2012 Issuance of Draft Air Pollution Permit-To-Install

BP-Husky Refining LLC
4001 Cedar Point Road, P.O. Box 696
Oregon, OH 43697
Lucas County
FACILITY DESC.: Petroleum Refineries
PERMIT #: P0108950
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Chapter 31 Modification to install a new recycle compressor in the B-Gas Oil Hydrotreater

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at:
<http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Peter Park, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
BP-Husky Refining LLC**

Facility ID:	0448020007
Permit Number:	P0108950
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	3/15/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
BP-Husky Refining LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. P029, "B" Train Gas Oil Hydrotreater 14

Authorization

Facility ID: 0448020007
Facility Description: Toledo Refinery
Application Number(s): A0042888, A0043351
Permit Number: P0108950
Permit Description: Chapter 31 Modification to install a new recycle compressor in the B-Gas Oil Hydrotreater
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/15/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

BP-Husky Refining LLC
4001 Cedar Point Road
P.O. Box 696
Oregon, OH 43697

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:

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

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: P0108950

Permit Description: Chapter 31 Modification to install a new recycle compressor in the B-Gas Oil Hydrotreater

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

Emissions Unit ID:	P029
Company Equipment ID:	"B" Train Gas Oil Hydrotreater
Superseded Permit Number:	04-708
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 Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services.
- 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 Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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



removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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



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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

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 unit contained in this permit is subject to 40 CFR Part 60 Subpart A, GGGa, QQQ, 40 CFR Part 63 Subpart A and CC: P029. The complete NSPS and 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 or local air agency.

C. Emissions Unit Terms and Conditions



1. P029, "B" Train Gas Oil Hydrotreater

Operations, Property and/or Equipment Description:

"B" Train Gas Oil Hydrotreater with feed drum emissions controlled by the West Flare

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.	O AC rule 3745-31-05(A)(3) (PTI 04-708 as modified on 8/5/1998)	22.08 tons per year volatile organic compound (VOC) emissions (from equipment leaks) See b)(2)a. and b.
b.	40 CFR Part 60, Subpart A	See b)(2)c.
c.	40 CFR Part 60, Subpart QQQ	See b)(2)d.
d.	40 CFR Part 63, Subpart A	See b)(2)e. and f.
e.	40 CFR Part 63, Subpart CC	See b)(2)f. and g.
f.	40 CFR Part 60, Subpart GGGa	See b)(2)h.
g.	OAC rule 3745-21-09(T)	See b)(2)i.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-21-09(T) and 40 CFR Part 60, Subparts A, GGGa, and QQQ.

b. The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

c. The flare shall meet the requirements of 40 CFR 60.18 (c) through (f).

d. In accordance with 40 CFR Part 60, Subpart QQQ, the permittee shall meet the individual drain system monitoring and record keeping program as outlined in the

terms and conditions for emissions unit P025 (Refinery Wastewater System). This condition is in reference to the water drains in this emissions unit.

- e. 40 CFR Part 63, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 63.
- f. Table 6 of 40 CFR Part 63, Subpart CC specifies the provisions of 40 CFR Part 63, Subpart A that apply and those that do not apply to permittees of emissions units subject to Subpart CC of 40 CFR Part 63.
- g. The permittee shall comply with the provisions of 40 CFR Part 60, Subpart VV. See 40 CFR 63.648 Equipment leak standards.
- h. Equipment leaks that are subject to the provisions of both 40 CFR Part 60, Subpart GGGa and 40 CFR Part 63, Subpart CC are required to comply only with the provisions specified in 40 CFR Part 60, Subpart GGGa. See 40 CFR 63.640(p).
- i. The permittee shall comply with the requirements for equipment leaks referencing OAC rule 3745-21-09(T).

[Note: Consistent with the U.S. EPA streamlining policy, the permittee may elect to demonstrate compliance with OAC rule 3745-21-09(T) by demonstrating compliance with the equipment leak standards in 40 CFR Part 63, Subpart CC for both equipment in organic HAP service and equipment not in organic HAP service. The MACT level monitoring of 40 CFR Part 63, Subpart CC is generally more stringent than the LDAR requirements of OAC rule 3745-21-09(T).]

c) Operational Restrictions

- (1) 40 CFR Part 63, Subpart A provides operational provisions that are pertinent to emissions units affected by 40 CFR Part 63, Subpart A.
- (2) The permittee shall comply with the provisions of 40 CFR Part 60, Subpart VV. See 40 CFR 63.648 Equipment leak standards.
- (3) The permittee shall comply with the provisions of 40 CFR Part 63, Subpart CC for the applicable miscellaneous process vent standards.

d) Monitoring and/or Recordkeeping Requirements

- (1) 40 CFR Part 63, Subpart A provides monitoring and record keeping requirements that are pertinent to emissions units affected by 40 CFR Part 63, Subpart A.
- (2) 40 CFR Part 60, Subpart VV provides equipment leak monitoring and recordkeeping requirements.
- (3) OAC 3745-21-07 and 3745-21-09(DD) provide equipment leak monitoring and record keeping for this refinery flare.



e) Reporting Requirements

- (1) 40 CFR Part 63, Subpart A provides reporting requirements that are pertinent to emissions units affected by 40 CFR Part 63, Subpart A.
- (2) 40 CFR Part 60, Subpart VV provides equipment leak reporting requirements.
- (3) OAC 3745-21-07 and 3745-21-09(DD) provide reporting requirements for this refinery flare.

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:

Emission Limitation:

22.08 tons per year VOC emissions from equipment leaks

Applicable Compliance Method:

The leak detection and repair monitoring, record keeping and reporting requirements specified in sections c),d), and e) and shall serve as demonstration of compliance with this emission limitation.

The emission limit of 22.08 tons per year VOC emissions from equipment leaks was determined by multiplying the total number of components by a leaking factor of 2% of the total components. This product is then multiplied by the corresponding leak screening value correlation, multiplied by 2.2 lbs/kg, multiplied by 8760 hours per year, and divided by 2000 pounds per ton to obtain the VOC emission rate in tons per year for each type of leaking component for a total of 22.08 tons per year VOC emissions from equipment leaks. The leak screening values are listed in tables 2-10 and 2-14 of *Protocol for Equipment Leak Emission Estimates* (EPA document 453/R-95-017 or subsequent updates).

- (2) See 40 CFR Part 60, Subpart VV for the applicable equipment leak testing requirements.
- (3) See ORC rule 3704.031 for the applicable testing requirements for this refinery flare.

g) Miscellaneous Requirements

- (1) None.