



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13534

DATE: 4/10/2001

BP Chemicals Inc
James Walpole
1900 Fort Amanda Rd
Lima, OH 45804

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.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission 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 within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 4/10/2001

FINAL PERMIT TO INSTALL 03-13534

Application Number: 03-13534
APS Premise Number: 0302020015
Permit Fee: **\$800**
Name of Facility: BP Chemicals Inc
Person to Contact: James Walpole
Address: 1900 Fort Amanda Rd
Lima, OH 45804

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1900 Fort Amanda Rd
Lima, Ohio**

Description of proposed emissions unit(s):

installation of new light ends column to replace batch still column on acetonitrile mfg plant & increase capacity to 30 million lbs per yr & change from batch to continuous process.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 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



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the 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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

7. 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.

8. 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).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC | 21.51 |

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P048 - acetonitrile reactor and absorption section (modification of existing emission units P048 & P015). Modification involves a conversion to a continuous process with a resulting increase in production capacity. | OAC rule 3745-31-05(A)(3) | 1.63 lbs organic compounds (OC)/hr, 7.14 tons OC/yr |
| | | See A.I.2.e |
| | OAC rule 3745-21-09(DD) | See A.I.2.c and A.I.2.d |
| | 40 CFR 60 Subpart VV | See A.I.2.d |
| | 40 CFR 60 Subpart NNN | See A.I.2.c and A.I.2.d |
| | 40 CFR 63 Subpart G | See A.I.2.c and A.I.2.d |
| | 40 CFR 63 Subpart H | See A.I.2.d |
| | OAC rule 3745-17-11(B)(1) | none (see A.I.2.a) |
| OAC rule 3745-17-07(A) | none (see A.I.2.b) | |

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(i), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14) does not include gaseous fuels used solely as fuel for the flare as a control device.

- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.c** Emissions from emissions unit P048: reactor and absorption section which includes the acetonitrile light ends column, digester and associated process condensers, shall be vented to a closed process vent system. The closed process vent system shall meet the following control requirements:
- i. all process vent emissions shall be combusted in a flare.
- The permittee shall operate the flare to meet the applicable conditions specified in OAC rule 3745-21-09(DD)(10), 40 CFR 60 Subpart III and 40 CFR 63 Subpart G.
- 2.d** The permittee shall include the appropriate process equipment and regulated components for emission unit P048 in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall comply with the appropriate provisions (includes operational restrictions, monitoring and recordkeeping, reporting, and testing) of OAC rule 3745-21-09 (DD) Leaks from process units that produce organic chemicals, 40 CFR 60 Subpart VV (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry), and 40 CFR 63 Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks).
- 2.e** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(DD), 40 CFR 60 Subpart VV, 40 CFR 60 Subpart NNN, 40 CFR 63 Subpart G, and 40 CFR Subpart H.

II. Operational Restrictions

1. The permittee shall comply with the following process vent operational restrictions for this emissions unit:
 - a. the closed vent system shall be operated at all times when emissions may be vented to it;
 - b. Flare Operational Restrictions [OAC rule 3745-21-09(DD)(10)]

Emissions Unit ID: P048

- i. the flare shall be designed for and operated with no visible emissions as determined by "Method 22, 40 CFR, Part 60, Appendix A," except for periods not to exceed a total of five minutes during any 120 consecutive minutes;
 - ii. the flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure;
 - iii. the flare shall be steam-assisted;
 - iv. the net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be 300 Btu/scf or greater;
 - v. the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than 60 feet per second; and,
 - vi. the permittee shall ensure the flare is operated and maintained in conformance with its design.
- c. The permittee shall comply with the LDAR program operational restrictions, see A.I.2.d.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall comply with the following monitoring requirements for this emissions unit:
 - a. Flare Monitoring Requirements
 - i. The flare shall be monitored with a thermocouple or any other equivalent device to detect the presence of a pilot flame. If an electric arc ignition system is employed, the arcing shall be monitored to detect any failure. [40 CFR 63.114(a)(2)]
 - ii. The permittee shall maintain and operate a flow indicator which provides a record

of the acetonitrile reactor and absorption section vent stream flow to the flare at least once per hour. The flow indicator shall be installed in the vent stream at a point closest to the flare before being joined with any other vent stream.

[40 CFR 60.663(b)(2)]

- iii. The permittee shall monitor the flare via a closed circuit television system to minimize visible emissions at all times.
2. The permittee shall comply with the following recordkeeping requirements for this emissions unit:
- a. The permittee shall comply with the recordkeeping requirements contained in OAC rule 3745-21-09(DD), 40 CFR 60 Subpart NNN and 40 CFR 63 Subpart G.
 - b. The permittee shall maintain records of all periods when there is no flow rate of the closed vent stream. [40 CFR 63.118(a)(3)]
 - c. The following information shall be recorded for the flare, and kept in a readily accessible location:
 - i. detailed schematics, design specifications, and piping and instrumentation diagrams;
 - ii. the dates and descriptions of any changes in the design specification;
 - iii. a description of the parameter or parameters monitored to ensure that the flare is operated and maintained in conformance with its design, and an explanation of the reason for selecting such parameter or parameters;
 - iv. periods when the closed vent system and flare are not operated as designed, including periods when a flare pilot light does not have a flame; and
 - v. dates of start-ups and shutdowns of the closed vent system and flare.
[OAC Rule 3745-21-09(DD)(14)(d)]

Emissions Unit ID: P048

- d. The permittee shall collect and record a daily log or record of operating time for the closed vent system, flare and monitoring equipment. The information shall be maintained in the company's files for a period of five years.
- e. Flare Recordkeeping Requirements

The permittee shall maintain the following records:
 - i. flow rate to the flare recorded at least once every hour [40 CFR 60.665(d)];
 - ii. records of all periods when the closed vent stream is diverted from the flare or when there is no flow rate [40 CFR 60.665(d)];
 - iii. records of all hourly periods when the flare pilot flame is absent.
[40 CFR 63.118(a)(1)]; and,
 - iv. records of all parameters listed in 40 CFR 60.665(b)(3).
- f. The permittee shall comply with the LDAR program monitoring and recordkeeping requirements, see A.I.2.d.

IV. Reporting Requirements

1. The permittee shall comply with the following reporting requirements for this emissions unit:
 - a. all reporting shall comply with the requirements contained in OAC rule 3745-21-09, Subpart NNN and 40 CFR 63 Subpart G.
 - b. the permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - i. exceedances of all monitored parameters;
 - ii. periods of time when the closed vent system stream is diverted from system control devices;
 - iii. all periods of time when the flare was not operational;
 - iv. all periods of time when required monitoring data was not collected; and,
 - v. all periods of time during which the pilot flame on the flare is not functioning properly.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall comply with the LDAR program reporting requirements, see A.I.2.d.
3. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR 60, Subpart NNN, and 40 CFR 63, Subpart G & H for this emissions unit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:
1.63 lbs OC/hr

Applicable Compliance Method:

The flare emission limitation was developed by applying a 98 percent reduction efficiency for control with a flare to a maximum uncontrolled emission rate of 81.50 lbs OC/hr. Compliance shall be demonstrated by ensuring the flare operates at the proper efficiency through the monitoring and recordkeeping specified in A.III.1.a. and A.III.2.e. and testing specified in A.V.2.

- b. Emission Limitation:
7.14 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. Performance Testing Requirements:
- a. The permittee shall comply with the performance testing requirements of OAC rule 3745-21-09, 40 CFR 60 Subpart NNN, and 40 CFR 63 Subpart F.
- i. The permittee shall determine within 3 months after the start-up of this emissions unit, the net heating value of the gas being combusted in the flare controlling this emissions unit using the following equation:
- $$H_T = K \sum_{i=1}^n C_i H_i$$
- where:
- H_T = Net heating value of the sample, MJ/scm; where the net enthalpy per mole of gas is based on combustion at 25 degrees Centigrade and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 degrees Centigrade;
- C_i = Concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77; and
- H_i = Net heat of combustion of sample component i, kcal/g mole at 25 degrees Centigrade and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 if published values are not available or cannot be calculated.
- K = Constant, 1.740×10^{-7} (1/ppm)(g mole/scm) (MJ/kcal) where the standard temperature for (g mole/scm) is 20 degrees Centigrade
- ii. The permittee shall determine within 3 months after the start-up of this emissions unit, the actual exit velocity of the flare controlling this emissions unit by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip.
3. The permittee shall comply with the LDAR program testing requirements, see A.I.2.d.
4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to

Emissions Unit ID: P048

Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

5. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
6. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

VI. Miscellaneous Requirements

NSPS Requirements

Emissions unit P048 is subject to Subparts VV and NNN of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

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 requirements to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P048 - acetonitrile reactor and absorption section (modification of existing emission units P048 & P015). Modification involves a conversion to a continuous process with a resulting increase in production capacity. | none | none |

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P074 - acetonitrile recovery and purification section (previously permitted as emission units P074 under PTI #03-08660 issued on 10/4/95 and existing unit P012). Modification involves a conversion to a continuous process with a resulting increase in production capacity. | OAC rule 3745-31-05(A)(3) | 3.28 lbs organic compounds (OC)/hr, 14.37 tons OC/yr |
| | | See A.I.2.e |
| | OAC rule 3745-21-09(DD) | See A.I.2.c and A.I.2.d |
| | 40 CFR 60 Subpart VV | See A.I.2.d |
| | 40 CFR 60 Subpart NNN | See A.I.2.c and A.I.2.d |
| | 40 CFR 63 Subpart G | See A.I.2.c and A.I.2.d |
| | 40 CFR 63 Subpart H | See A.I.2.d |
| | OAC rule 3745-17-11(B)(1) | none (see A.I.2.a) |
| OAC rule 3745-17-07(A) | none (see A.I.2.b) | |

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(i), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14) does not include gaseous

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fuels used solely as fuel for the flare as a control device.

- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.c** Emissions from emissions unit P074: recovery and purification section which includes the acetonitrile drying column, acetonitrile product column and associated process condensers, shall be vented to a closed process vent system. The closed process vent system shall meet the following control requirements:
- i. all process vent emissions shall be combusted in a flare.
- The permittee shall operate the flare to meet the applicable conditions specified in OAC rule 3745-21-09(DD)(10), 40 CFR 60 Subpart NNN and 40 CFR 63 Subpart G.
- 2.d** The permittee shall include the appropriate process equipment and regulated components for emission unit P074 in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall comply with the appropriate provisions (includes operational restrictions, monitoring and recordkeeping, reporting, and testing) of OAC rule 3745-21-09 (DD) Leaks from process units that produce organic chemicals, 40 CFR 60 Subpart VV (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry), and 40 CFR 63 Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks).
- 2.e** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(DD), 40 CFR 60 Subpart VV, 40 CFR 60 Subpart NNN, 40 CFR 63 Subpart G, and 40 CFR Subpart H.

II. Operational Restrictions

1. The permittee shall comply with the following process vent operational restrictions for this emissions unit:
 - a. the closed vent system shall be operated at all times when emissions may be vented to it;
 - b. Flare Operational Restrictions [OAC rule 3745-21-09(DD)(10)]
 - i. the flare shall be designed for and operated with no visible emissions as determined by "Method 22, 40 CFR, Part 60, Appendix A," except for periods not to exceed a total of five minutes during any 120 consecutive minutes;

- ii. the flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure;
 - iii. the flare shall be steam-assisted;
 - iv. the net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be 300 Btu/scf or greater;
 - v. the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than 60 feet per second; and,
 - vi. the permittee shall ensure the flare is operated and maintained in conformance with its design.
- c. The permittee shall comply with the LDAR program operational restrictions, see A.I.2.d.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall comply with the following monitoring requirements for this emissions unit:
 - a. Flare Monitoring Requirements
 - i. The flare shall be monitored with a thermocouple or any other equivalent device to detect the presence of a pilot flame. If an electric arc ignition system is employed, the arcing shall be monitored to detect any failure. [40 CFR 63.114(a)(2)]
 - ii. The permittee shall maintain and operate a flow indicator which provides a record of the acetonitrile recovery and purification section vent stream flow to the flare at least once per hour. The flow indicator shall be installed in the vent stream at a point closest to the flare before being joined with any other vent stream. [40 CFR 60.663(b)(2)]
 - iii. The permittee shall monitor the flare via a closed circuit television system to minimize visible emissions at all times.
2. The permittee shall comply with the following recordkeeping requirements for this emissions unit:
 - a. The permittee shall comply with the recordkeeping requirements contained in OAC rule 3745-21-09(DD), 40 CFR 60 Subpart NNN and 40 CFR 63 Subpart G.

- b. The permittee shall maintain records of all periods when there is no flow rate of the closed vent stream. [40 CFR 63.118(a)(3)]
- c. The following information shall be recorded for the flare, and kept in a readily accessible location:
 - i. detailed schematics, design specifications, and piping and instrumentation diagrams;
 - ii. the dates and descriptions of any changes in the design specification;
 - iii. a description of the parameter or parameters monitored to ensure that the flare is operated and maintained in conformance with its design, and an explanation of the reason for selecting such parameter or parameters;
 - iv. periods when the closed vent system and flare are not operated as designed, including periods when a flare pilot light does not have a flame; and
 - v. dates of start-ups and shutdowns of the closed vent system and flare. [OAC Rule 3745-21-09(DD)(14)(d)]
- d. The permittee shall collect and record a daily log or record of operating time for the closed vent system, flare and monitoring equipment. The information shall be maintained in the company's files for a period of five years.
- e. Flare Recordkeeping Requirements

The permittee shall maintain the following records:

 - i. flow rate to the flare recorded at least once every hour [40 CFR 60.665(d)];
 - ii. records of all periods when the closed vent stream is diverted from the flare or when there is no flow rate [40 CFR 60.665(d)];
 - iii. records of all hourly periods when the flare pilot flame is absent. [40 CFR 63.118(a)(1)]; and,
 - iv. records of all parameters listed in 40 CFR 60.665(b)(3).
- f. The permittee shall comply with the LDAR program monitoring and recordkeeping

requirements, see A.I.2.d.

IV. Reporting Requirements

1. The permittee shall comply with the following reporting requirements for this emissions unit:
 - a. all reporting shall comply with the requirements contained in OAC rule 3745-21-09, Subpart NNN and 40 CFR 63 Subpart G.
 - b. the permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - i. exceedances of all monitored parameters;
 - ii. periods of time when the closed vent system stream is diverted from system control devices;
 - iii. all periods of time when the flare was not operational;
 - iv. all periods of time when required monitoring data was not collected; and,
 - v. all periods of time during which the pilot flame on the flare is not functioning properly.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall comply with the LDAR program reporting requirements, see A.I.2.d.
3. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR 60, Subpart NNN, and 40 CFR 63, Subpart G & H for this emissions unit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.28 lbs OC/hr

Emissions Unit ID: P074

Applicable Compliance Method:

The flare emission limitation was developed by applying a 98 percent reduction efficiency for control with a flare to a maximum uncontrolled emission rate of 164.00 lbs OC/hr. Compliance shall be demonstrated by ensuring the flare operates at the proper efficiency through the monitoring and recordkeeping specified in A.III.1.a. and A.III.2.e. and testing specified in A.V.2.

- b. Emission Limitation:
14.37 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. Performance Testing Requirements:
- a. The permittee shall comply with the performance testing requirements of OAC rule 3745-21-09, 40 CFR 60 Subpart NNN, and 40 CFR 63 Subpart F.
- i. The permittee shall determine within 3 months after the start-up of this emissions unit, the net heating value of the gas being combusted in the flare controlling this emissions unit using the following equation:
- $$H_T = K \sum_{i=1}^n C_i H_i$$
- where:
- H_T = Net heating value of the sample, MJ/scm; where the net enthalpy per mole of gas is based on combustion at 25 degrees Centigrade and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 degrees Centigrade;
- C_i = Concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77; and
- H_i = Net heat of combustion of sample component i, kcal/g mole at 25 degrees Centigrade and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 if published values are not available or cannot be calculated.
- K = Constant, 1.740×10^{-7} (1/ppm)(g mole/scm) (MJ/kcal) where the standard temperature for (g mole/scm) is 20 degrees Centigrade
- ii. The permittee shall determine within 3 months after the start-up of this emissions unit, the actual exit velocity of the flare controlling this emissions unit by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip.
3. The permittee shall comply with the LDAR program testing requirements, see A.I.2.d.
4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification

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shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

Emissions Unit ID: P074

5. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
6. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

VI. Miscellaneous Requirements

NSPS Requirements

Emissions unit P074 is subject to Subparts VV and NNN of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

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 requirements to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P074 - acetonitrile recovery and purification section (previously permitted as emission units P074 under PTI #03-08660 issued on 10/4/95 and existing unit P012). Modification involves a conversion to a continuous process with a resulting increase in production capacity. | none | none |

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

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V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13534 Facility ID: 0302020015

FACILITY NAME BP Chemicals Inc

FACILITY DESCRIPTION installation of new light ends column to replace batch still column on acetonitrile mfg plant & increase capacity to 30 million lbs per yr & change from batch to continuous process CITY/TWP Lima

SIC CODE 2869 SCC CODE 3-01-254-99 EMISSIONS UNIT ID P048

EMISSIONS UNIT DESCRIPTION acetonitrile reactor and absorption section

DATE INSTALLED 1960 (digester), April 2001 (new light end column)

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | 1.63 lbs/hr | 7.14 | 1.63 lbs/hr | 7.14 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? Sub. VV & NNN NESHAP? Sub. G & H PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of flare and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13534

Facility ID: 0302020015

FACILITY NAME BP Chemicals Inc

FACILITY DESCRIPTION installation of new light ends column to CITY/TWP Lima

Emissions Unit ID: P074

continuous process

SIC CODE 2869

SCC CODE 3-01-254-99

EMISSIONS UNIT ID P074

EMISSIONS UNIT DESCRIPTION acetonitrile drying column & acetonitrile product column

DATE INSTALLED 1995 (drying column)

1995 (drying column)
1959 (product column)

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | 3.28 lbs/hr | 14.37 | 3.28 lbs/hr | 14.37 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? Sub. VV & NNN

NESHAP? Sub. G & H

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of flare and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 03-13534

Facility ID: 0302020015

FACILITY NAME BP Chemicals Inc

FACILITY DESCRIPTION installation of new light ends column to CITY/TWP Lima

Emissions Unit ID: P074

continuous process

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

| | <u>Electronic</u> | <u>Additional information File Name Convention (your PTI # plus this letter)</u> | <u>Hard Copy</u> | <u>None</u> |
|---|-------------------------------------|--|--------------------------|-------------------------------------|
| <u>Calculations (required)</u> | <input checked="" type="checkbox"/> | 0313534c.wpd | <input type="checkbox"/> | |
| <u>Modeling form/results</u> | <input type="checkbox"/> | 0000000s.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>PTI Application (complete or partial)*</u> | <input type="checkbox"/> | 0000000a.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>BAT Study</u> | <input type="checkbox"/> | 0000000b.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>Other/misc.</u> | <input type="checkbox"/> | 0000000t.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

See Calculations and Permit Review Forms

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC | 21.51 |

NEW SOURCE REVIEW FORM B

PTI Number: 03-13534

Facility ID: 0302020015

FACILITY NAME BP Chemicals Inc

FACILITY DESCRIPTION installation of new light ends column to CITY/TWP Lima

Emissions Unit ID: P074

continuous process