



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
ALLEN COUNTY
Application No: 03-03549

DATE: 3/9/2004

BP Chemicals Inc
Charles Treloar
1900 Fort Amanda Rd
Lima, OH 45802-0628

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely

A handwritten signature in cursive script that reads "Michael W. Ahern".

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 3/9/2004
Effective Date: 3/9/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-03549

Application Number: **03-03549**
APS Premise Number: **0302020015**
Permit Fee: **\$0**
Name of Facility: **BP Chemicals Inc**
Person to Contact: **Charles Treloar**
Address: **1900 Fort Amanda Rd
Lima, OH 45802-0628**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1900 Fort Amanda Rd
Lima, OHIO**

Description of modification:
(7) storage tanks.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

BP Chemicals Inc

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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 ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

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

	T069			DRE
	T070			
		Source Identification <u>Description</u>	BAT <u>Determination</u>	Internal floating roof
T065		Raw Wastewater Tank, T-1	Use of absorber off-gas incinerator (AOGI) w/98% destruction removal efficiency (DRE)	Internal Floating roof
T066		Sludge Storage Tank T-2		
		Filtered waste water tank, T-3	Use of AOI w/98% DRE	
T067		Recirculation Tank		
			Use of AOI w/98% DRE	
T068		Solids Removal & dewatering (sand filter, clarifier, filter press)		
P062		Use of AOI w/98% DRE		
		Deepwell surge Tank, T-5		
		Deepwell Surge Tank, T-6	Use of AOI w/98%	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	07 3745-21-09			
Applicable Federal & OAC Rules	3745-31-05 3745-21-07 3745-21-09	Permit Allowable Mass Emissions and/or Control/Usage Requirements		
	3745-31-05 3745-21-07 3745-21-09	See special term & condition #1; 8 lbs VOC/yr 2 lbs AN/yr		
3745-31-05	3745-31-05	See Special T&C #1		
3745-21-07	3745-21-07	8 lbs VOC/yr		
3745-21-09	3745-21-09	2 lbs AN/yr		
3745-31-05	3745-31-05	See Special T&C #1		
3745-21-07	3745-21-07	8 lbs VOC/yr		
3745-21-09	3745-21-09	2 lbs AN/yr		
3745-31-05	3745-31-05	See Special T&C #1		
3745-21-07	3745-21-07	8 lbs VOC/yr		
3745-21-09	3745-21-09	2 lbs AN/yr		
3745-31-05	3745-31-05	See Special T&C #1		
3745-21-07	3745-21-07	8 lbs VOC/yr		
3745-21-09	3745-21-09	2 lbs AN/yr		
3745-31-05	3745-31-05	See Special T&C #1		
3745-21-07	3745-21-07	8 lbs VOC/yr		
3745-21-09	3745-21-09	2 lbs AN/yr		
3745-31-05	3745-31-05	See special T&C #2		
3745-21-07	3745-21-07	1219 lbs VOC/yr		
3745-21-09	3745-21-09	341 lbs AN/yr		
3745-31-05	3745-31-05	See special T&C #2		
3745-21-07	3745-21-07	1219 lbs VOC/yr		
3745-21-09	3745-21-09	341 lbs AN/yr		

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<u>Ohio</u> <u>EPA</u> <u>Source</u> <u>Number</u>	<u>Source</u> <u>Identification</u> <u>Number</u>	<u>BAT</u> <u>Determination</u>	<u>Applicable Federal &</u> <u>OAC Rules</u>	<u>Permit Allowable</u> <u>Mass Emissions</u> <u>and/or Control/Usage</u> <u>Requirements</u>
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**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Compounds (VOC)	1.23
Acrylonitrile (AN)	.34*

* See special term and condition #3.

This condition in no way limits the applicability of any other state or federal regulation.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office , 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

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

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office, 347 North Tunbridge Road, Bowling Green, Ohio 43402.**

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. In accordance with OAC rule 3745-31-05, Best Available Technology for Sources T065, T066, T067, T068, and P062 has been determined to be the use of the Absorber Off Gas Incinerator (AOGI) to reduce organic compound emissions by 98%. Additionally, for all tanks and equipment controlled by the absorber off-gas incinerator (AOGI), a monitoring program shall be developed and implemented which incorporates the following provisions:
 - a. Yearly monitoring of all pump seals, pipeline valves in liquid service in accordance with the method specified in 3745-21-1 (F);
 - b. Quarterly monitoring of all compressor seals, pipeline valves in gas service and pressure relief valves in gas service in accordance with the method specified in 3745-21-1 (F);
 - c. Monthly monitoring of all pump seals by visual methods;
 - d. Monitoring of any pump seal in accordance with the method specified in 3745-21-10 (F) within five working days after the valve has vented to the atmosphere;
 - e. Monitoring of any relief valve in accordance with the method specified in 3745-21-10 (F) within five working days after the valve has vented to the atmosphere;
 - f. All pipeline valves in gas service and pressure relief valves in gas service shall be clearly marked and identified in such a manner that they will be obvious to both refinery personnel performing monitoring and to the director;
 - g. If a leak is identified as a result of the monitoring program and the concentration of VOC exceeds ten thousand parts per million by volume, a tag shall immediately be placed on the leaking component. The tag shall be readily visible and weatherproof, it shall bear an identification number, and it shall clearly indicate the date the leak was detected. The tag shall remain in place until the leaking component is repaired;
 - h. A monitoring log shall be maintained for all leaking components which are tagged. The monitoring log shall contain, at a minimum, the following data:
 - i. The name of the process unit where the leaking component is located;
 - ii. The type of leaking component (such as valve, seal, or other component);
 - iii. The tag number of leaking component;

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- iv. The date on which the leaking component was detected;
 - v. The date on which the leaking component was repaired;
 - vi. The date and results of the monitoring performed within five working days after the leaking component was repaired;
 - vii. A record of the calibration of the monitoring instrument;
 - viii. A list of those leaking components which cannot be repaired until the next process unit turnaround; and
 - ix. The total number of components monitored and the total number of components found leaking during the calendar year.
- i. A copy of any monitoring log shall be retained by the owner or operator for a minimum of two years after the date on which the record was made or the report was prepared;
 - j. A copy of any monitoring log shall immediately be made available to the Director or any authorized representative of the Director, upon verbal or written request, during normal business hours; and
 - k. A report shall be submitted to the Director by February 1 that gives the total number of components monitored during the previous calendar year, gives the total number of components found leaking during the previous calendar year, identified all components which were found leaking during the previous calendar year but which were not repaired within fifteen days, and identified all leaking components which cannot be repaired until the next process unit turnaround.
2. In accordance with OAC rule 3745-31-05, Best Available Technology for Sources T069 and T070 has been determined to be as follows:

A fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times (i.e. off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for the automatic bleeder vents, rim space vents, stub drains, and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e. no visible gap) except when the device is in actual use. Automatic bleeder lines are to be closed at all times when the cover is floating

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except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting.

3. The use of the deepwell pond shall cease when the deepwell storage facilities are operational. This cessation is specified under the RCRA permitting process and will reduce acrylonitrile emissions by approximately ten tons per year (emissions from the treatment facilities are reduced to 0.34 tons per year).
4. The facility shall submit an annual report of the wastewater sampling program currently required by the RCRA waste analysis plan under the Part B permit. The report shall list the concentrations of acetonitrile., acrylonitrile, acrolein, and HCN.