



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 04-01394**

**Fac ID: 0448020007**

**DATE: 4/28/2005**

BP Products North America Inc  
Allen Ellett  
696  
Toledo, OH 43697-0696

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

TDES



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**Permit To Install  
Terms and Conditions**

**Issue Date: 4/28/2005  
Effective Date: 4/28/2005**

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**FINAL PERMIT TO INSTALL 04-01394**

Application Number: 04-01394  
Facility ID: 0448020007  
Permit Fee: **\$4500**  
Name of Facility: BP Products North America Inc  
Person to Contact: Allen Ellett  
Address: 696  
Toledo, OH 43697-0696

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4001 Cedar Point Road  
Oregon, Ohio**

Description of proposed emissions unit(s):  
**Installation of two new 353 MMBTU/hr boilers with next generation ultra -low NOx burners to replace the existing Power and Riley boilers.**

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.9 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 ninety (90) 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.

#### 12. 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.

## **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**

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. 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.

**5. 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.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

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**PTI Application: 04-01394**  
**Issued: 4/28/2005**

**Facility ID: 0448020007**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. 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>
CO	205.29 (94.89 increase)
NO <sub>x</sub>	33.90
PM <sub>10</sub>	14.03
SO <sub>2</sub>	22.00
VOC	16.67

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

#### I. Nitrogen Oxides (NOx) Budget Trading Program OAC Chapter 3745-14

1. Facility Code - 0448020007
2. The following regulated emissions units are subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NOx allowance allocations listed below:  
  
Emissions Units  
B034 and B035
3. The emissions units identified in Section A.II.2 above are NOx budget units under OAC rule 3745-14-01(C)(1)(b).  
[OAC rule 3745-14-01(C)(1)]
4. NOx allowances for units commencing operation on the dates specified in OAC rule 3745-14-05(C)(4) shall be allocated from the new source set-aside in accordance with the provisions of OAC rule 3745-14-05(C)(4)(d).  
[OAC rule 3745-14-05(C)(4)]
5. The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.  
[OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1)]
6. Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in

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an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.

[OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c)]

7. NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.

[OAC rule 3745-14-01(E)(3)(d)]

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8. A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.  
[OAC rule 3745-14-01(E)(3)(e)]
9. Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.  
[OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 3745-14-01(E)(4)(b)]
10. When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.  
[OAC rule 3745-14-01(E)(3)(h)]
11. Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08. Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.  
[OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1)]
12. The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).  
[OAC rule 3745-14-08(A)(5)]
13. The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)

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- a. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period

until such documents are superseded because of the submission of a new account certificate or representation changing the NOx authorized account representative;

- b. all emission monitoring information, in accordance with OAC rule 3745-14-08;
- c. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and
- d. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.

[OAC rule 3745-14-01(E)(5)(a)(i) through (iv)]

- 14. The permittee, and to the extent applicable, the NOx authorized account representative of the NOx budget unit, shall comply with the monitoring and reporting requirements as provided in OAC rule 3745-14-08 and in 40 CFR Part 75, Subpart H. For purposes of complying with such requirements the definitions in OAC rule 3745-14-01(B) and in 40 CFR 72.2 shall apply, and the terms "affected unit," "designated representative," and "continuous emission monitoring system" (or "CEMS") in 40 CFR Part 75 shall be replaced by the terms "NOx budget unit," "NOx authorized account representative," and "continuous emission monitoring system" (or "CEMS"), respectively, as defined in OAC rule 3745-14-01(B).  
[OAC rule 3745-14-08(A)]
- 15. The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan is only required to include information required by 40 CFR Part 75, Subpart H.  
[OAC rule 3745-14-08(E)(2)(b)]
- 16. The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.  
[OAC rule 3745-14-01(E)(4)(b)]
- 17. Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:

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"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on

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my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NO<sub>x</sub> authorized account representative for a NO<sub>x</sub> budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.

[OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b)]

18. The NO<sub>x</sub> authorized account representative shall submit quarterly reports covering the period May 1 through September 30 of each year and including the data described in 40 CFR 75.74(c)(6). The NO<sub>x</sub> authorized account representative shall submit such quarterly reports, beginning with the calendar quarter covering May 1 through June 30, 2003. The NO<sub>x</sub> authorized account representative shall submit each quarterly report to the Administrator within thirty days following the end of the calendar quarter covered by the report. Quarterly reports shall be submitted in the manner specified in 40 CFR Part 75, Subpart H.  
[OAC rules 3745-14-08(E)(4)(b) and 3745-14-08(E)(4)(c)(i)]
19. The NO<sub>x</sub> authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
  - a. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
  - b. for a unit with add-on NO<sub>x</sub> emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NO<sub>x</sub> emissions.

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[OAC rule 3745-14-08(E)(4)(d)(i) and (ii)]

20. The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account

representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.

[OAC rules 3745-14-08(D) and 3745-14-08(E)(3)]

21. For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units. The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:

- a. identification of each NOx budget unit;
- b. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
- c. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
- d. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.

[OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2)]

22. In the compliance certification report under Section A.II.21.d above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:

- a. whether the unit was operated in compliance with the NOx budget emission

limitation;

- b. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information

necessary to attribute NOx emissions to the unit, in accordance with OAC rule 3745-14-08;

- c. whether all the NOx emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
- d. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.

If a change is required to be reported under Section A.II.22.d above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.

[OAC rule 3745-14-04(A)(3)]

- 23. The NOx authorized account representative shall submit a complete NOx budget permit renewal application for the NOx budget source covering the NOx budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.  
[OAC rule 3745-14-03(B)(3)(a)]
- 24. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NOx budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.  
[OAC rule 3745-14-01(E)(2)(b)]
- 25. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on-site and available for inspection during regular office hours.  
[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

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**Issued: 4/28/2005**

**Facility ID: 0448020007**

**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>
B034 - East Alstom Boiler - 353 mmBtu/hr heater fired with refinery fuel gas and/or natural gas with ultra-low NOx burners	OAC rule 3745-17-07(A)
	OAC rule 3745-17-10(B)
	OAC rule 3745-18-54(W)(1)
	OAC rule 3745-21-07(B)
	OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-14
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-08(B)
	40 CFR Part 60, Subpart Db
	40 CFR Part 60, Subpart J
	40 CFR Part 63, Subpart DDDDD

40 CFR Part 60, Subpart A

Applicable Emissions Limitations/Control Measures	See section A.I.2.b.
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.	See section A.I.2.j.
See section A.I.2.a.	See section A.I.2.f.
See section A.I.2.a.	See section A.I.2.e.
See section A.I.2.d	0.10 pound of NO <sub>x</sub> (expressed as NO <sub>2</sub> ) per mmBtu heat input
See section A.I.2.d.	See section A.I.2.h.
38.48 pounds per hour and 168.53 tons per rolling, 12-month period of carbon monoxide (CO)	See section A.I.2.c.
6.35 pound per hour and 27.83 tons per rolling, 12-month period of nitrogen oxides (NO <sub>x</sub> )	See section A.I.2.g.
2.63 pound per hour and 11.52 tons per rolling, 12-month period of PM <sub>10</sub> emissions	See section A.I.2.i.
7.80 pound per hour and 22.00 tons sulfur dioxide (SO <sub>2</sub> ) per rolling, 12-month period	
1.90 pound per hour and 8.34 ton per rolling, 12-month period of volatile organic compounds (VOC)	
0.36 pound per hour and 1.01 ton per rolling, 12 month period of sulfuric acid mist (H <sub>2</sub> SO <sub>4</sub> )	

**2. Additional Terms and Conditions**

- 2.a** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart J.
- 2.c** The permittee shall not burn in this emissions unit any refinery fuel gas that has a volume-weighted, rolling, 3-hour average H<sub>2</sub>S concentration greater than 230 milligrams per dry standard cubic meter (0.10 grain per dry standard cubic foot) or a rolling 3-hour average SO<sub>2</sub> concentration of 20 parts per million by volume, dry basis, adjusted to 0% excess air, depending on which monitoring system is chosen..
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.
- On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- 2.f** The combined CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 shall not respectively exceed 205.29, 33.90, 14.03, 22.0,, and 16.67 tons per rolling 12-month period.
- 2.g** The permittee shall comply with the requirements of 40 CFR Part 63, Subpart DDDDD upon start-up of B034.
- 2.h** The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Db.
- 2.i** The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart A and 40 CFR Part 63, Subpart A.

- 2.j** See Part II, Section A.I of this permit for the requirements of OAC Chapter 3745-14 applicable to this unit.
- 2.k** Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system, designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO<sub>x</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

## II. Operational Restrictions

1. The permittee shall only burn natural gas and/or refinery fuel gas in this emissions unit.
2. The combined heat input to two boilers (B034 and B035) shall be limited to a maximum firing rate of 3,766,800 mmBtu/yr based on a rolling, 12-month summation of the monthly firing rate.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the firing rate levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Firing Rate, MMBtu/month(s)</u>
1	525,264
1-2	1,050,000

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1-3	1,575,264
1-4	2,100,528
1-5	2,625,792
1-6	3,151,056
1-7	3,676,320
1-8	3,766,800
1-9	3,766,800
1-10	3,766,800
1-11	3,766,800
1-12	3,766,800

After the first 12 calendar months of operation, compliance with annual firing rate limitations shall be based upon a rolling, 12-month summation of the monthly firing rates.

- The combined emissions from B034 and B035 shall not exceed 22.0 tons SO<sub>2</sub>, 205.29 tons CO, 33.90 tons NO<sub>x</sub>, 14.03 tons PM<sub>10</sub>, and 16.67 tons VOC per year.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Emissions, <u>tons/month(s)</u>				
	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>VOC</u>
1	5.80	28.60	4.72	1.96	1.39
1-2	11.60	57.20	9.44	3.92	2.78
1-3	17.40	85.80	14.16	5.88	4.17
1-4	22.00	114.40	18.88	7.84	5.56
1-5	22.00	143.00	23.60	9.80	6.95
1-6	22.00	171.60	28.32	11.76	8.34
1-7	22.00	200.20	33.04	13.72	9.73
1-8	22.00	205.29	33.90	14.03	11.12
1-9	22.00	205.29	33.90	14.03	12.51
1-10	22.00	205.29	33.90	14.03	13.90
1-11	22.00	205.29	33.90	14.03	15.29
1-12	22.00	205.29	33.90	14.03	16.67

After the first 12 calendar months of operation, compliance with annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

- Start-up of one of the two boilers (B034 & B035) can occur prior to shut down of the Riley and Power boilers. However, the permittee shall permanently remove from service both the Riley and Power boilers prior to starting up the second boiler to obtain emissions reductions of 2.88 tons SO<sub>2</sub> per year and 42.66 tons CO per year from the Riley Boiler (B004) and 4.83 tons SO<sub>2</sub> per year and 67.72 tons CO per year from the Power Boiler (B020).

5. The permittee shall operate and maintain equipment to continuously monitor and record the NO<sub>x</sub> emissions from this emissions unit when combusting natural gas and/or refinery fuel gas.

### III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than refinery fuel gas or natural gas, the permittee shall maintain a record of the type, quantity, and heating value in Btu/dscf of the fuel burned.
2. The permittee shall calibrate, maintain and operate a continuous monitoring system for measurement of the H<sub>2</sub>S content in the fuel gas before being burned in this fuel gas combustion device or a continuous monitoring system for measuring the SO<sub>2</sub> and O<sub>2</sub> concentrations in the stack..
  - a. The H<sub>2</sub>S monitoring device shall continuously monitor and record the concentration (dry basis) of H<sub>2</sub>S in fuel gases before being burned in any fuel gas combustion device. The SO<sub>2</sub> monitoring device shall continuously monitor and record the concentration (dry basis) of the SO<sub>2</sub> and O<sub>2</sub> content of the stack gas before it is exhausted to the atmosphere.
  - b. The span value for this instrument is 425 mg/dscm H<sub>2</sub>S or 50 ppm SO<sub>2</sub> and 10% oxygen.
  - c. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H<sub>2</sub>S in the fuel gas being burned.
  - d. The performance evaluations for this H<sub>2</sub>S monitor shall use Performance Specification 7. Method 11, 15, 15A, or 16 shall be used for conducting the relative accuracy evaluations. Performance evaluations for an SO<sub>2</sub> monitor shall use Performance Specification 2. Methods 6 or 6C and 3 or 3A shall be used for conducting the relative accuracy evaluations.
3. The permittee must automatically check the zero (or low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span must, as a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit of the applicable performance specification in appendix B of 40 CFR Part 60. The system must allow the amount of the excess zero and span drift to be recorded and quantified whenever specified.
4. Monitors that automatically adjust the data to the corrected calibration values (e.g., microprocessor control) must be programmed to record the unadjusted concentration measured

in the calibration drift (CD) prior to resetting the calibration, if performed, or record the amount of adjustment.

5. If either the zero (or low-level) or high-level CD result exceeds twice the applicable drift specification in Appendix B of 40 CFR part 60 for five, consecutive, daily periods, the CEMS is out-of-control. If either the zero (or low-level) or high-level CD result exceeds four times the applicable drift specification in 40 CFR Part 60, Appendix B during any CD check, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action. Following corrective action, repeat the CD checks.
6. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required in 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: the continuous monitoring system for measuring emissions shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15- minute period.
7. One-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non-reduced form (e.g., ppm pollutant and percent O<sub>2</sub> or ng/J of pollutant). All excess emissions shall be converted into units of the standard. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit.
8. The permittee must implement a quality control program. As a minimum, each quality control program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

- a. Calibration of CEMS.
- b. CD determination and adjustment of CEMS.
- c. Preventive maintenance of CEMS (including spare parts inventory).
- d. Data recording, calculations, and reporting.
- e. Accuracy audit procedures including sampling and analysis methods.
- f. Program of corrective action for malfunctioning CEMS.

As described in Section 5.2 of 40 CFR Part 60, Appendix F Procedure 1, whenever excessive inaccuracies occur for two consecutive quarters, the source permittee must revise the current written procedures or modify or replace the CEMS to correct the deficiency causing the excessive inaccuracies.

9. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.
10. The permittee shall monitor and record the daily and monthly average firing rate in terms of standard cubic feet per hour, mmBtu/hr, and mmBtu/month for this emission unit. Each month, the permittee shall add the monthly firing total rate to the total firing rate for the previous 11 months to determine the rolling, 12-month summation of the monthly firing rate. Also during the first 12 calendar months of operation, the permittee shall record the cumulative firing rate for each calendar month.
11. The permittee shall monitor and record the daily and monthly average firing rate in terms of standard cubic feet per hour, mmBtu/hr and mmBtu/month for B034 and B035 combined. Each month, the permittee shall add the monthly total firing rate to the total firing rate for the previous 11 months to determine the rolling, 12 month summation of the monthly firing rate. Also during the first 12 calendar months of operation, the permittee shall record the cumulative firing rate for each calendar month.
12. Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 2 for approval by the Ohio EPA, Central Office.

Each continuous monitoring system consists of all the equipment used to acquire and record data

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in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

13. The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s) as required by OAC 3745-14. As stated under 40 CFR 60.48b(B)(2), this monitoring system may be used to determine the compliance of 40 CFR 60.48b. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75, if applicable.

The permittee shall maintain records of data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million on an instantaneous (one-minute) basis;
  - b. emissions of NO<sub>x</sub> in pounds per hour, pounds per million Btu, and in all units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits or linearity checks if applicable;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
14. The permittee shall maintain records of the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from this emissions unit. Each month the permittee shall add the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions total to the total for the previous 11 months to determine the rolling, 12-month summation of emissions. Also during the first 12 calendar months of operation, the permittee shall record the cumulative emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC for each calendar month.
15. The permittee shall maintain records of the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 combined for each calendar month. Also during the first 12 calendar months of operation, the permittee shall record the cumulative CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 combined for each calendar month.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than refinery fuel gas and/or natural gas was burned in this emissions unit. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation/excursion reports that identify:
  - a. each period in which the firing rates for B034 and B35 identified in Section A.II.2 were exceeded;
  - b. each period in which combined CO emission limitation under A.I.2.f was exceeded;
  - c. each period in which combined NO<sub>x</sub> emission limitation under A.I.2.f was exceeded;
  - d. each period in which combined PM<sub>10</sub> emission limitation under A.I.2.f was exceeded;
  - e. each period in which combined SO<sub>2</sub> emission limitation under A.I.2.f was exceeded; and,
  - f. each period in which combined VOC emission limitation under A.I.2.f was exceeded;

These reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

3. The permittee shall submit an H<sub>2</sub>S or SO<sub>2</sub> excess emissions and monitoring systems performance report and/or a summary report form to the Toledo Division of Environmental Services quarterly, or except when the Administrator of USEPA, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit. All reports shall be postmarked by the 30th day following the end of each three-month period. Excess emissions are each rolling 3-hour average H<sub>2</sub>S concentration greater than 0.10 grain per dry standard cubic foot of fuel gas burned or a rolling 3-hour average SO<sub>2</sub> concentration of 20 ppmv, dry basis, adjusted to 0% excess air. Written reports of excess emissions shall include the following information:
  - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

- b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
    - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
    - d. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
  4. The summary report form shall contain the information and be in the format shown in Figure 1 of 40 CFR 60.7 unless otherwise specified by the Administrator of USEPA. One summary report form shall be submitted for each pollutant monitored at each affected facility.
    - a. If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator of USEPA.
    - b. If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.
5. The permittee shall submit a quarterly report for each CEMS containing the accuracy results from Section 6 and the CD assessment results from Section 4 of 40 CFR Part 60, Appendix F Procedure Report the drift and accuracy information as a Data Assessment Report (DAR), and include one copy of this DAR for each quarterly audit with the report of emissions required under the applicable subparts of this part. As a minimum, the DAR must contain the following information:
  - a. Permittee name and address.
  - b. Identification and location of monitors in the CEMS.
  - c. Manufacturer and model number of each monitor in the CEMS.
  - d. Assessment of CEMS data accuracy and date of assessment as determined by a Relative Accuracy Test Audit (RATA), Relative Accuracy Audit (RAA), or Cylinder Gas Audit (CGA) described in Section 5 of 40 CFR Part 60, Appendix F Procedure 1 including the

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relative accuracy for the RATA, the Accuracy (A) for the RAA or CGA, the Reference Method (RM) results, the cylinder gases certified values, the CEMS responses, and the calculations results as defined in Section 6 of 40 CFR Part 60, Appendix F Procedure 1. If the accuracy audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit results showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.

- e. Results from USEPA performance audit samples described in Section 5 of 40 CFR Part 60, Appendix F Procedure 1 and the applicable RM's.
- f. Summary of all corrective actions taken when CEMS was determined out-of-control, as described in Sections 4 and 5 of 40 CFR Part 60, Appendix F Procedure 1.

An example of a DAR format is shown in Figure 1 of 40 CFR Part 60, Appendix F Procedure 1.

- 6. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Toledo Division of Environmental Services, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - (1.) the facility name and address;
    - (2.) the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - (3.) the location of the continuous NO<sub>x</sub> monitor;
    - (4.) the exceedance report as detailed in (a) above;
    - (5.) the total NO<sub>x</sub> emissions for the calendar quarter (tons);
    - (6.) the total operating time (hours) of the emissions unit;
    - (7.) the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
    - (8.) results and date of quarterly cylinder gas audits or linearity checks if applicable;

- (9.) results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- (10.) the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- (11.) the date, time, and duration of any/each malfunction\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- (12.) the date, time, and duration of any downtime\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- (13.) the reason (if known) and the corrective actions taken (if any) for each event in (b)(11) and (12).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

7. This emissions unit is subject to the applicable provisions of Subparts Db and J 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 40 CFR Part 60.7, the permittee is hereby advised of the requirement 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  
P. O. Box 163669

**BP Products North America Inc**  
**PTI Application: 04 01304**  
**Issued**

**Facility ID: 0448020007**

Emissions Unit ID: B034

Columbus, Ohio 43216-3669

and

Toledo Division of Environmental Services  
348 South Erie Street  
Toledo, Ohio 43602

**V. Testing Requirements**

1. Compliance with the emissions limitation(s) in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.10 grain H<sub>2</sub>S per dry standard cubic foot of fuel gas burned as a volume-weighted, rolling, 3-hour average or 20 parts per million SO<sub>2</sub>, in the stack gas, as a volume weighted dry basis, adjusted to 0% excess air, rolling, 3-hour average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements of section A.III. If required, compliance shall also be demonstrated based upon the methods and procedures of 40 CFR 60.106(e)(1) or 40 CFR 60.106(f)(1).

c. Emission Limitation:

7.80 pound per hour SO<sub>2</sub>

Applicable Compliance Method:

Allowable emissions are based on operation at maximum capacity with a maximum H<sub>2</sub>S concentration of 0.10 gr/dscf or 20 ppmv SO<sub>2</sub> dry basis, adjusted to 0% excess air. Therefore compliance with the 0.10 grain H<sub>2</sub>S per dry standard cubic foot of fuel gas burned as a volume-weighted, rolling, 3-hour average emission limitation or 20 ppmv SO<sub>2</sub> dry basis, adjusted to 0% excess air constitutes compliance with the hourly SO<sub>2</sub> emission limitation.

d. Emission Limitation:

22.00 tons per rolling, 12-month period of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be based on CEM data used to calculate the SO<sub>2</sub> emissions under section A.III.12.

e. Emission Limitation:

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**BP Pr**

**PTI A**

**Issued: 4/28/2005**

Emissions Unit ID: B034

22 tons per rolling, 12-month period of SO<sub>2</sub> from B034 and B035 combined.

Applicable Compliance Method:

Compliance shall be based on CEM data used to calculate the SO<sub>2</sub> emissions under section A.III.13.

f. Emission Limitation:

38.48 pounds per hour CO

Applicable Compliance Method:

Multiply the vendor supplied emission factor of 0.109 lb/mmBtu times the maximum firing rate (353 mmBtu/hr). If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 10 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

g. Emission Limitation:

168.53 tons per rolling, 12-month period CO

Applicable Compliance Method:

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly CO limit constitutes compliance with the annual CO limit.

h. Emission Limitation

205.29 tons per rolling, 12 month period combined CO emissions from B034 and B035

Applicable Compliance Method:

The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.

i. Emission Limitation:

2.63 pound per hour PM<sub>10</sub> emissions

Applicable Compliance Method:

Multiply the AP-42 section 1.4 particulate matter emission factor dated July 1998 of 7.6 lb/mmcf of fuel gas burned times the daily average fuel gas burned per hour times the fuel gas heating value correction factor. The heating value correction factor is equal to the ratio of the actual fuel gas heat content to the AP-42 heat content of 1020 Btu/scf. If required, compliance shall be demonstrated based upon the procedures specified in Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

j. Emission Limitation:

11.52 tons per rolling, 12-month period of PM<sub>10</sub> emissions

Applicable Compliance Method:

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

k. Emission Limitation

14.03 tons per rolling, 12 month period combined PM<sub>10</sub> emissions from B034 and B035

Applicable Compliance Method:

The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.

l. Emission Limitation:

6.35 pound per hour NO<sub>x</sub>

Applicable Compliance Method:

Prior to the certification of the NO<sub>x</sub> CEMS, multiply the vendor supplied NO<sub>x</sub> emission factor of 0.018 lb/mmBtu by the daily average fuel gas burned per hour to determine the hourly NO<sub>x</sub> emissions. After the certification of the NO<sub>x</sub> CEMS, the NO<sub>x</sub> CEMS shall be used demonstrate compliance.

m. Emission Limitation:

27.83 tons NO<sub>x</sub> per rolling, 12-month period

Applicable Compliance Method:

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**BP Pr**

**PTI A**

**Issued: 4/28/2005**

Emissions Unit ID: B034

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly NO<sub>x</sub> limit constitutes compliance with the annual NO<sub>x</sub> limit.

- n. Emission Limitation
- 33.90 tons per rolling, 12 month period combined NO<sub>x</sub> emissions from B034 and B035
- Applicable Compliance Method:
- The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.
- o. Emission Limitation:
- 1.90 pound per hour VOC emissions
- Applicable Compliance Method:
- Multiply the AP-42 section 1.4 VOC emission factor dated July 1998 of 5.5 lb/mmcf of fuel gas burned corrected for heating value by the daily average fuel gas burned per hour. The heating value correction factor is equal to the ratio of the actual fuel gas heat content to the AP-42 heat content of 1020 Btu/scf. If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.
- p. Emission Limitation:
- 8.34 ton per rolling, 12-month period VOC emissions
- Applicable Compliance Method:
- Annual allowable emissions are based upon operation at maximum capacity for 8760 hours per year. Compliance with the hourly VOC emissions limit constitutes compliance with the annual limit.
- q. Emission Limitation:
- 16.67 tons per rolling, 12 month period combined VOC emissions from B034 and B035
- Applicable Compliance Method:
- The monitoring and record keeping requirements under section A.III.11 and 13 shall serve

as demonstration of compliance with this emission limitation.

r. Emission Limitation:

0.36 lb/hr H<sub>2</sub>SO<sub>4</sub>

Applicable Compliance Method:

The permittee establishes that 3% of the SO<sub>2</sub> emissions are converted to H<sub>2</sub>SO<sub>4</sub>. Compliance shall be demonstrated by multiplying the maximum hourly SO<sub>2</sub> emission rate (7.8 lb/hr) by 0.03 multiplied by the molecular weight of H<sub>2</sub>SO<sub>4</sub> and divided by the molecular weight of SO<sub>2</sub>. If required, the permittee shall demonstrate compliance using methods 1 through 8 of 40 CFR Part 60, Appendix A. Alternative U.S.EPA approved test methods can be used with prior approval from Ohio EPA.

s. Emission Limitation:

1.01 ton per year H<sub>2</sub>SO<sub>4</sub>

Applicable Compliance Method:

The permittee establishes that 3% of the SO<sub>2</sub> emissions are converted to H<sub>2</sub>SO<sub>4</sub>. Compliance shall be demonstrated by multiplying the maximum annual SO<sub>2</sub> emissions rate (22 tons/yr) by 0.03 multiplied by the molecular weight of H<sub>2</sub>SO<sub>4</sub> and divided by the molecular weight of SO<sub>2</sub>. If required, the permittee shall demonstrate compliance using methods 1 through 8 of 40 CFR Part 60, Appendix A. Alternative U.S.EPA approved test methods can be used with prior approval from Ohio EPA.

t. Emission Limitation:

0.10 lb NO<sub>x</sub>/mmBtu (expressed as NO<sub>2</sub>)

Applicable Compliance Method:

The NO<sub>x</sub> CEMS data shall be used to demonstrate compliance with this emission limitation.

2. Emission testing requirements

The permittee shall conduct, or have conducted, emission testing for this emissions unit in

accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days of startup.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
Methods 1 through 4, 6 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services's refusal to accept the results of the emission test(s).

Personnel from the Toledo Division of Environmental Services 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.

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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

## **VI. Miscellaneous Requirements**

1. Excessive Audit Inaccuracy. If the RA, using the RATA, CGA, or RAA exceeds the criteria in section 5.2.3, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action to eliminate the problem. Following corrective action, the source permittee must audit the CEMS with a RATA, CGA, or RAA to determine if the CEMS is operating within the specifications. A RATA must always be used following an out-of-control period resulting from a RATA. The audit following corrective action does not require analysis of USEPA

performance audit samples. If audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.

**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>
B034 - East Alstom Boiler - 353 mmBtu/hr heater fired with refinery fuel gas and/or natural gas with ultra low NOx burners	Air Toxics Policy	See section B.III.1.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (B034) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane

TLV (mg/m<sup>3</sup>): 180

Maximum Hourly Emission Rate (lbs/hr): 1.27

Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m<sup>3</sup>): 1.47

MAGLC (ug/m<sup>3</sup>): 4286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**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>
B035 - West Alstom Boiler - 353 mmBtu/hr heater fired with refinery fuel gas and/or natural gas with ultra-low NOx burners	OAC rule 3745-17-07(A)
	OAC rule 3745-17-10(B)
	OAC rule 3745-18-54(W)(1)
	OAC rule 3745-21-07(B)
	OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-14
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-08(B)
	40 CFR Part 60, Subpart Db
40 CFR Part 60, Subpart J	
40 CFR Part 63, Subpart DDDDD	

Emissions Unit ID: B035

40 CFR Part 60, Subpart A

Applicable Emissions  
 Limitations/Control Measures

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.

See section A.I.2.a.

See section A.I.2.a.

See section A.I.2.d

See section A.I.2.d.

38.48 pounds per hour and 168.53 tons per rolling, 12-month period of carbon monoxide (CO)

6.35 pound per hour and 27.83 tons per rolling, 12-month period of nitrogen oxides (NO<sub>x</sub>)

2.63 pound per hour and 11.52 tons per rolling, 12-month period of PM<sub>10</sub> emissions

7.80 pound per hour and 22.00 tons sulfur dioxide (SO<sub>2</sub>) per rolling, 12-month period

1.90 pound per hour and 8.34 ton per rolling, 12-month period of volatile organic compounds (VOC)

0.36 pound per hour and 1.01 ton per rolling, 12 month period of sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>)

See section A.I.2.b.

See section A.I.2.j.

See section A.I.2.f.

See section A.I.2.e.

0.10 pound of NO<sub>x</sub> expressed as NO<sub>2</sub> per mmBtu heat input

See section A.I.2.h.

See section A.I.2.c.

See section A.I.2.g.

See section A.I.2.i.

**2. Additional Terms and Conditions**

- 2.a** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart J.
- 2.c** The permittee shall not burn in this emissions unit any refinery fuel gas that has a volume-weighted, rolling, 3-hour average H<sub>2</sub>S concentration greater than 230 milligrams per dry standard cubic meter (0.10 grain per dry standard cubic foot) or a rolling 3-hour average SO<sub>2</sub> concentration of 20 parts per million by volume, dry basis, adjusted to 0% excess air, depending on which monitoring system is chosen..
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** The combined CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 shall not respectively exceed 205.29, 33.90, 14.03, 22.0,, and 16.67 tons per rolling 12-month period.
- 2.g** The permittee shall comply with the requirements of 40 CFR Part 63, Subpart DDDDD upon start-up of B035.
- 2.h** The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart

Db.

- 2.i The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart A and 40 CFR Part 63, Subpart A.
- 2.j See Part II, Section A.I of this permit for the requirements of OAC Chapter 3745-14 applicable to this unit.
- 2.k Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system, designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO<sub>x</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

## II. Operational Restrictions

1. The permittee shall only burn natural gas and/or refinery fuel gas in this emissions unit.
2. The combined heat input to two boilers (B034 and B035) shall be limited to a maximum firing rate of 3,766,800 mmBtu/yr based on a rolling, 12-month summation of the monthly firing rate.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the firing rate levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Firing Rate, MMBtu/month(s)</u>
1	525,264
1-2	1,050,000
1-3	1,575,264
1-4	2,100,528
1-5	2,625,792
1-6	3,151,056
1-7	3,676,320
1-8	3,766,800
1-9	3,766,800
1-10	3,766,800
1-11	3,766,800
1-12	3,766,800

After the first 12 calendar months of operation, compliance with annual firing rate limitations shall be based upon a rolling, 12-month summation of the monthly firing rates.

3. The combined emissions from B034 and B035 shall not exceed 22.0 tons SO<sub>2</sub>, 205.29 tons CO, 33.90 tons NO<sub>x</sub>, 14.03 tons PM<sub>10</sub>, and 16.67 tons VOC per year.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Emissions, tons/month(s)</u>				
	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>VOC</u>
1	5.80	28.60	4.72	1.96	1.39
1-2	11.60	57.20	9.44	3.92	2.78
1-3	17.40	85.80	14.16	5.88	4.17
1-4	22.00	114.40	18.88	7.84	5.56
1-5	22.00	143.00	23.60	9.80	6.95
1-6	22.00	171.60	28.32	11.76	8.34
1-7	22.00	200.20	33.04	13.72	9.73
1-8	22.00	205.29	33.90	14.03	11.12
1-9	22.00	205.29	33.90	14.03	12.51
1-10	22.00	205.29	33.90	14.03	13.90
1-11	22.00	205.29	33.90	14.03	15.29
1-12	22.00	205.29	33.90	14.03	16.67

After the first 12 calendar months of operation, compliance with annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

4. Start-up of one of the two boilers (B034 & B035) can occur prior to shut down of the Riley and Power boilers. However, the permittee shall permanently remove from service both the Riley and

Power boilers prior to starting up the second boiler to obtain emissions reductions of 2.88 tons SO<sub>2</sub> per year and 42.66 tons CO per year from the Riley Boiler (B004) and 4.83 tons SO<sub>2</sub> per year and 67.72 tons CO per year from the Power Boiler (B020).

5. The permittee shall operate and maintain equipment to continuously monitor and record the NO<sub>x</sub> emissions from this emissions unit when combusting natural gas and/or refinery fuel gas.

### III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than refinery fuel gas or natural gas, the permittee shall maintain a record of the type, quantity, and heating value in Btu/dscf of the fuel burned.
2. The permittee shall calibrate, maintain and operate a continuous monitoring system for measurement of the H<sub>2</sub>S content in the fuel gas before being burned in this fuel gas combustion device or a continuous monitoring system for measuring the SO<sub>2</sub> and O<sub>2</sub> concentrations in the stack..
  - a. The H<sub>2</sub>S monitoring device shall continuously monitor and record the concentration (dry basis) of H<sub>2</sub>S in fuel gases before being burned in any fuel gas combustion device. The SO<sub>2</sub> monitoring device shall continuously monitor and record the concentration (dry basis) of the SO<sub>2</sub> and O<sub>2</sub> content of the stack gas before it is exhausted to the atmosphere.
  - b. The span value for this instrument is 425 mg/dscm H<sub>2</sub>S or 50 ppm SO<sub>2</sub> and 10% oxygen.
  - c. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H<sub>2</sub>S in the fuel gas being burned.
  - d. The performance evaluations for this H<sub>2</sub>S monitor shall use Performance Specification 7. Method 11, 15, 15A, or 16 shall be used for conducting the relative accuracy evaluations. Performance evaluations for an SO<sub>2</sub> monitor shall use Performance Specification 2. Methods 6 or 6C and 3 or 3A shall be used for conducting the relative accuracy evaluations.
3. The permittee must automatically check the zero (or low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span must, as a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit of the applicable performance specification in appendix B of 40 CFR Part 60. The system must allow

Emissions Unit ID: B035

the amount of the excess zero and span drift to be recorded and quantified whenever specified.

4. Monitors that automatically adjust the data to the corrected calibration values (e.g., microprocessor control) must be programmed to record the unadjusted concentration measured in the calibration drift (CD) prior to resetting the calibration, if performed, or record the amount of adjustment.
5. If either the zero (or low-level) or high-level CD result exceeds twice the applicable drift specification in Appendix B of 40 CFR part 60 for five, consecutive, daily periods, the CEMS is out-of-control. If either the zero (or low-level) or high-level CD result exceeds four times the applicable drift specification in 40 CFR Part 60, Appendix B during any CD check, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action. Following corrective action, repeat the CD checks.
6. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required in 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: the continuous monitoring system for measuring emissions shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15- minute period.
7. One-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non-reduced form (e.g., ppm pollutant and percent O<sub>2</sub> or ng/J of pollutant). All excess emissions shall be converted into units of the standard. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit.
8. The permittee must implement a quality control program. As a minimum, each quality control program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

- a. Calibration of CEMS.
- b. CD determination and adjustment of CEMS.
- c. Preventive maintenance of CEMS (including spare parts inventory).
- d. Data recording, calculations, and reporting.
- e. Accuracy audit procedures including sampling and analysis methods.
- f. Program of corrective action for malfunctioning CEMS.

As described in Section 5.2 of 40 CFR Part 60, Appendix F Procedure 1, whenever excessive inaccuracies occur for two consecutive quarters, the source permittee must revise the current written procedures or modify or replace the CEMS to correct the deficiency causing the excessive inaccuracies.

9. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.
10. The permittee shall monitor and record the daily and monthly average firing rate in terms of standard cubic feet per hour, mmBtu/hr, and mmBtu/month for this emission unit. Each month, the permittee shall add the monthly firing total rate to the total firing rate for the previous 11 months to determine the rolling, 12-month summation of the monthly firing rate. Also during the first 12 calendar months of operation, the permittee shall record the cumulative firing rate for each calendar month.
11. The permittee shall monitor and record the daily and monthly average firing rate in terms of standard cubic feet per hour, mmBtu/hr and mmBtu/month for B034 and B035 combined. Each month, the permittee shall add the monthly total firing rate to the total firing rate for the previous 11 months to determine the rolling, 12 month summation of the monthly firing rate. Also during the first 12 calendar months of operation, the permittee shall record the cumulative firing rate for each calendar month.
12. Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 2 for approval by the Ohio EPA, Central Office.

Each continuous monitoring system consists of all the equipment used to acquire and record data

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**Facility ID: 0448020007**

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in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

13. The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s) as required by OAC 3745-14. As stated under 40 CFR 60.48b(B)(2), this monitoring system may be used to determine the compliance of 40 CFR 60.48b. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75, if applicable.

The permittee shall maintain records of data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million on an instantaneous (one-minute) basis;
  - b. emissions of NO<sub>x</sub> in pounds per hour, pounds per million Btu, and in all units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits or linearity checks if applicable;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
14. The permittee shall maintain records of the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from this emissions unit. Each month the permittee shall add the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions total to the total for the previous 11 months to determine the rolling, 12-month summation of emissions. Also during the first 12 calendar months of operation, the permittee shall record the cumulative emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC for each calendar month.
15. The permittee shall maintain records of the monthly CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 combined for each calendar month. Also during the first 12 calendar months of operation, the permittee shall record the cumulative CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC emissions from B034 and B035 combined for each calendar month.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than refinery fuel gas and/or natural gas was burned in this emissions unit. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation/excursion reports that identify:
  - a. each period in which the firing rates for B034 and B35 identified in Section A.II.2 were exceeded;
  - b. each period in which combined CO emission limitation under A.I.2.f was exceeded;
  - c. each period in which combined NO<sub>x</sub> emission limitation under A.I.2.f was exceeded;
  - d. each period in which combined PM<sub>10</sub> emission limitation under A.I.2.f was exceeded;
  - e. each period in which combined SO<sub>2</sub> emission limitation under A.I.2.f was exceeded; and,
  - f. each period in which combined VOC emission limitation under A.I.2.f was exceeded;

These reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

3. The permittee shall submit an H<sub>2</sub>S or SO<sub>2</sub> excess emissions and monitoring systems performance report and/or a summary report form to the Toledo Division of Environmental Services quarterly, or except when the Administrator of USEPA, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit. All reports shall be postmarked by the 30th day following the end of each three-month period. Excess emissions are each rolling 3-hour average H<sub>2</sub>S concentration greater than 0.10 grain per dry standard cubic foot of fuel gas burned or a rolling 3-hour average SO<sub>2</sub> concentration of 20 ppmv, dry basis, adjusted to 0% excess air. Written reports of excess emissions shall include the following information:
  - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
  - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

- c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
    - d. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
  4. The summary report form shall contain the information and be in the format shown in Figure 1 of 40 CFR 60.7 unless otherwise specified by the Administrator of USEPA. One summary report form shall be submitted for each pollutant monitored at each affected facility.
    - a. If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator of USEPA.
    - b. If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.
5. The permittee shall submit a quarterly report for each CEMS containing the accuracy results from Section 6 and the CD assessment results from Section 4 of 40 CFR Part 60, Appendix F Procedure Report the drift and accuracy information as a Data Assessment Report (DAR), and include one copy of this DAR for each quarterly audit with the report of emissions required under the applicable subparts of this part. As a minimum, the DAR must contain the following information:
  - a. Permittee name and address.
  - b. Identification and location of monitors in the CEMS.
  - c. Manufacturer and model number of each monitor in the CEMS.
  - d. Assessment of CEMS data accuracy and date of assessment as determined by a Relative Accuracy Test Audit (RATA), Relative Accuracy Audit (RAA), or Cylinder Gas Audit (CGA) described in Section 5 of 40 CFR Part 60, Appendix F Procedure 1 including the

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relative accuracy for the RATA, the Accuracy (A) for the RAA or CGA, the Reference Method (RM) results, the cylinder gases certified values, the CEMS responses, and the calculations results as defined in Section 6 of 40 CFR Part 60, Appendix F Procedure 1. If the accuracy audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit results showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.

- e. Results from USEPA performance audit samples described in Section 5 of 40 CFR Part 60, Appendix F Procedure 1 and the applicable RM's.
- f. Summary of all corrective actions taken when CEMS was determined out-of-control, as described in Sections 4 and 5 of 40 CFR Part 60, Appendix F Procedure 1.

An example of a DAR format is shown in Figure 1 of 40 CFR Part 60, Appendix F Procedure 1.

- 6. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Toledo Division of Environmental Services, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - (1.) the facility name and address;
    - (2.) the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - (3.) the location of the continuous NO<sub>x</sub> monitor;
    - (4.) the exceedance report as detailed in (a) above;
    - (5.) the total NO<sub>x</sub> emissions for the calendar quarter (tons);
    - (6.) the total operating time (hours) of the emissions unit;
    - (7.) the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
    - (8.) results and date of quarterly cylinder gas audits or linearity checks if applicable;

- (9.) results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- (10.) the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- (11.) the date, time, and duration of any/each malfunction\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- (12.) the date, time, and duration of any downtime\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- (13.) the reason (if known) and the corrective actions taken (if any) for each event in (b)(11) and (12).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

7. This emissions unit is subject to the applicable provisions of Subparts Db and J 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 40 CFR Part 60.7, the permittee is hereby advised of the requirement 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  
P. O. Box 163669

**BP Products North America Inc**  
**PTI Application: 04 01304**  
**Issued**

**Facility ID: 0448020007**

Emissions Unit ID: B035

Columbus, Ohio 43216-3669

and

Toledo Division of Environmental Services  
348 South Erie Street  
Toledo, Ohio 43602

**V. Testing Requirements**

1. Compliance with the emissions limitation(s) in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.10 grain H<sub>2</sub>S per dry standard cubic foot of fuel gas burned as a volume-weighted, rolling, 3-hour average or 20 parts per million SO<sub>2</sub>, in the stack gas, as a volume weighted dry basis, adjusted to 0% excess air, rolling, 3-hour average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements of section A.III. If required, compliance shall also be demonstrated based upon the methods and procedures of 40 CFR 60.106(e)(1) or 40 CFR 60.106(f)(1).

c. Emission Limitation:

7.80 pound per hour SO<sub>2</sub>

Applicable Compliance Method:

Allowable emissions are based on operation at maximum capacity with a maximum H<sub>2</sub>S concentration of 0.10 gr/dscf or 20 ppmv SO<sub>2</sub> dry basis, adjusted to 0% excess air. Therefore compliance with the 0.10 grain H<sub>2</sub>S per dry standard cubic foot of fuel gas burned as a volume-weighted, rolling, 3-hour average emission limitation or 20 ppmv SO<sub>2</sub> dry basis, adjusted to 0% excess air constitutes compliance with the hourly SO<sub>2</sub> emission limitation.

d. Emission Limitation:

22.00 tons per rolling, 12-month period of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be based on CEM data used to calculate the SO<sub>2</sub> emissions under section A.III.12.

e. Emission Limitation:

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**PTI A**

**Issued: 4/28/2005**

Emissions Unit ID: B035

22 tons per rolling, 12-month period of SO<sub>2</sub> from B034 and B035 combined.

Applicable Compliance Method:

Compliance shall be based on CEM data used to calculate the SO<sub>2</sub> emissions under section A.III.13.

f. Emission Limitation:

38.48 pounds per hour CO

Applicable Compliance Method:

Multiply the vendor supplied emission factor of 0.109 lb/mmBtu times the maximum firing rate (353 mmBtu/hr). If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 10 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

g. Emission Limitation:

168.53 tons per rolling, 12-month period CO

Applicable Compliance Method:

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly CO limit constitutes compliance with the annual CO limit.

h. Emission Limitation

205.29 tons per rolling, 12 month period combined CO emissions from B034 and B035

Applicable Compliance Method:

The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.

i. Emission Limitation:

2.63 pound per hour PM<sub>10</sub> emissions

Applicable Compliance Method:

Multiply the AP-42 section 1.4 particulate matter emission factor dated July 1998 of 7.6 lb/mmcf of fuel gas burned times the daily average fuel gas burned per hour times the fuel gas heating value correction factor. The heating value correction factor is equal to the ratio of the actual fuel gas heat content to the AP-42 heat content of 1020 Btu/scf. If required, compliance shall be demonstrated based upon the procedures specified in Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

j. Emission Limitation:

11.52 tons per rolling, 12-month period of PM<sub>10</sub> emissions

Applicable Compliance Method:

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

k. Emission Limitation

14.03 tons per rolling, 12 month period combined PM<sub>10</sub> emissions from B034 and B035

Applicable Compliance Method:

The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.

l. Emission Limitation:

6.35 pound per hour NO<sub>x</sub>

Applicable Compliance Method:

Prior to the certification of the NO<sub>x</sub> CEMS, multiply the vendor supplied NO<sub>x</sub> emission factor of 0.018 lb/mmBtu by the daily average fuel gas burned per hour to determine the hourly NO<sub>x</sub> emissions. After the certification of the NO<sub>x</sub> CEMS, the NO<sub>x</sub> CEMS shall be used demonstrate compliance.

m. Emission Limitation:

27.83 tons NO<sub>x</sub> per rolling, 12-month period

Applicable Compliance Method:

Annual allowable emissions are based on operation at maximum capacity for 8760 hours per year. Compliance with the hourly NO<sub>x</sub> limit constitutes compliance with the annual NO<sub>x</sub> limit.

- n. Emission Limitation
- 33.90 tons per rolling, 12 month period combined NO<sub>x</sub> emissions from B034 and B035
- Applicable Compliance Method:
- The monitoring and record keeping requirements under section A.III.11 and 13 shall serve as demonstration of compliance with this emission limitation.
- o. Emission Limitation:
- 1.90 pound per hour VOC emissions
- Applicable Compliance Method:
- Multiply the AP-42 section 1.4 VOC emission factor dated July 1998 of 5.5 lb/mmcf of fuel gas burned corrected for heating value by the daily average fuel gas burned per hour. The heating value correction factor is equal to the ratio of the actual fuel gas heat content to the AP-42 heat content of 1020 Btu/scf. If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.
- p. Emission Limitation:
- 8.34 ton per rolling, 12-month period VOC emissions
- Applicable Compliance Method:
- Annual allowable emissions are based upon operation at maximum capacity for 8760 hours per year. Compliance with the hourly VOC emissions limit constitutes compliance with the annual limit.
- q. Emission Limitation:
- 16.67 tons per rolling, 12 month period combined VOC emissions from B034 and B035
- Applicable Compliance Method:
- The monitoring and record keeping requirements under section A.III.11 and 13 shall serve

as demonstration of compliance with this emission limitation.

r. Emission Limitation:

0.36 lb/hr H<sub>2</sub>SO<sub>4</sub>

Applicable Compliance Method:

The permittee establishes that 3% of the SO<sub>2</sub> emissions are converted to H<sub>2</sub>SO<sub>4</sub>. Compliance shall be demonstrated by multiplying the maximum hourly SO<sub>2</sub> emission rate (7.8 lb/hr) by 0.03 multiplied by the molecular weight of H<sub>2</sub>SO<sub>4</sub> and divided by the molecular weight of SO<sub>2</sub>. If required, the permittee shall demonstrate compliance using methods 1 through 8 of 40 CFR Part 60, Appendix A. Alternative U.S.EPA approved test methods can be used with prior approval from Ohio EPA.

s. Emission Limitation:

1.01 ton per year H<sub>2</sub>SO<sub>4</sub>

Applicable Compliance Method:

The permittee establishes that 3% of the SO<sub>2</sub> emissions are converted to H<sub>2</sub>SO<sub>4</sub>. Compliance shall be demonstrated by multiplying the maximum annual SO<sub>2</sub> emissions rate (22 tons/yr) by 0.03 multiplied by the molecular weight of H<sub>2</sub>SO<sub>4</sub> and divided by the molecular weight of SO<sub>2</sub>. If required, the permittee shall demonstrate compliance using methods 1 through 8 of 40 CFR Part 60, Appendix A. Alternative U.S.EPA approved test methods can be used with prior approval from Ohio EPA.

t. Emission Limitation:

0.10 lb NO<sub>x</sub>/mmBtu (expressed as NO<sub>2</sub>)

Applicable Compliance Method:

The NO<sub>x</sub> CEMS data shall be used to demonstrate compliance with this emission limitation.

2. Emission testing requirements

The permittee shall conduct, or have conducted, emission testing for this emissions unit in

accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days of startup.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
Methods 1 through 4, 6 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services's refusal to accept the results of the emission test(s).

Personnel from the Toledo Division of Environmental Services 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.

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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

## **VI. Miscellaneous Requirements**

1. Excessive Audit Inaccuracy. If the RA, using the RATA, CGA, or RAA exceeds the criteria in section 5.2.3, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action to eliminate the problem. Following corrective action, the source permittee must audit the CEMS with a RATA, CGA, or RAA to determine if the CEMS is operating within the specifications. A RATA must always be used following an out-of-control period resulting from a RATA. The audit following corrective action does not require analysis of USEPA

performance audit samples. If audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.

## 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>
B034 - East Alston Boiler - 353 mmBtu/hr heater fired with refinery fuel gas and/or natural gas with ultra low NOx burners	Air Toxics Policy	See section B.III.1.

### 2. Additional Terms and Conditions

- 2.a None.

## II. Operational Restrictions

None.

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (B035) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane

TLV (mg/m<sup>3</sup>): 180

Maximum Hourly Emission Rate (lbs/hr): 1.27

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1.47

MAGLC (ug/m<sup>3</sup>): 4286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.