



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
SCIOTO COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 07-00451

DATE: 9/12/2002

Sunoco Inc (RM)
Jim Fain
1019 Haverhill-Ohio Furnace Rd
Haverhill, OH 456299999

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 1600** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

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

CC: USEPA

PCHD

KY

WV



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT MODIFICATION OF PERMIT TO INSTALL 07-00451

Application Number: 07-00451
APS Premise Number: 0773000080
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sunoco Inc (RM)
Person to Contact: Jim Fain
Address: 1019 Haverhill-Ohio Furnace Rd
Haverhill, OH 456299999

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

**1019 Haverhill-Ohio Furnace Road
Haverhill, Ohio**

Description of proposed emissions unit(s):

admin mod Phenol III process unit.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

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.10 below if no deviations occurred during the quarter.

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- 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

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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

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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.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

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.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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

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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

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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> |
|---------------------|---------------------------------|
| VOC (vent) | 156.46 (net increase of 47.29) |
| VOC (fugitive) | 83.27 (net increase of 33.57) |
| Acetone (vent) | 30.05 (net increase of 9.05) |
| Acetone (fugitive) | 725.17 (net increase of 160.54) |
| NO _x | 106.04 |
| SO ₂ | 0.74 |
| PM/PM ₁₀ | 6.2 |
| CO | 94.0 |
| Ammonia | 33.82 (net increase of 13.26)* |

*Ammonia limits proposed reflect a change in the method of emissions estimation.

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

none

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

none

Sunoc
PTI A

Emissions Unit ID: P012

Issued: To be entered upon final issuance

P

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

- 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> |
|--|---|---|
| P012 - Phenol III Process Unit modification to change acetone emissions limitations based on performance test results | 3745-31-05 (A)(3) 3745-21-09(DD) 3745-21-09(EE) 40 CFR Part 60, Subpart VV **40 CFR Part 63, Subparts A, F, G, and H 3745-31-11 through 3745-31-20 | Total allowable vent emissions from the Phenol III process unit spent air catalytic incinerator shall not exceed: 69.26 lbs/day VOC 12.64 TPY VOC 4.93 lb/day Acetone 0.90 TPY Acetone 41.32 lbs/day NO _x 7.54 TPY NO _x See A.I.2.a below. Negligible PM/PM ₁₀ and SO ₂ and the vent emissions from the spent air catalytic incinerator shall be reduced as described in footnote No. 1; ***Estimated fugitive and process vessel emissions are 28.10 TPY VOC and 8.9 TPY Acetone; Fugitive emissions shall be minimized by implementing the applicable |

Sunoc**PTI A**Emissions Unit ID: **P012****Issued: To be entered upon final issuance**

provisions of the leak detection and repair programs in 3745-21-09 (DD), 40 CFR Part 63, Subpart H, 40 CFR Part 60, Subpart VV

- ** 40 CFR Part 63, Subpart G requires total organic HAP emissions to be reduced by 98 percent or limited to 20 ppm, by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent. The PSD BACT determination for the Phenol III vent emissions requires VOC emissions to be reduced by 99 percent.
- *** Fugitive emissions rates are estimates only and should not be considered as maximum allowable emissions rates.
- * All PM emissions can be considered to be PM₁₀ emissions.

2. Additional Terms and Conditions

- 2.a** BAT Determination: spent air catalytic incinerator with low-NO_x burner and compliance with 40 CFR Part 63, Subparts A, F, G, and H as applicable for new sources

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install a continuous temperature recording device in the gas stream immediately before and after the catalyst bed, in accordance with 40 CFR 63.114 (a)(1)(ii). The monitoring equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications.
2. The permittee shall maintain records of the temperature across the catalyst bed in accordance with 40 CFR 63.118(a), and maintain records in accordance with 40 CFR 63.118(f) and 63.152(b).
3. The permittee shall maintain a leak detection and repair program for equipment associated with the Phenol III process unit which is in organic hazardous air pollutant and/or VOC service. The leak detection and repair program shall be maintained in accordance with the requirements of 40 CFR Part 63 Subpart H.
4. The permittee shall maintain records for the leak detection and repair program requirements of 40

CFR Part 63 Subpart H in accordance with the requirements of 40 CFR 63.181.

5. The permittee shall monitor any bypass line(s) that could divert a vent stream away from the catalytic incinerator in accordance with 40 CFR Part 63 Section 63.114 (d).

The permittee shall install, calibrate, maintain, and operate a flow indicator that determines whether vent stream flow is present at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line that could divert the vent stream away from the control device to the atmosphere; or

Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month, if applicable, in accordance with 40 CFR Part 63, Section 63.114(d)(2).

6. The permittee shall maintain records of the flow indicator requirements for any bypass lines to the catalytic incinerator in accordance with 40 CFR Part 63 Section 63.118(a)(3).
7. The permittee shall verify the vessel capacity and vapor pressure per the provisions of 40 CFR 63.170 and Table 2 of 40 CFR Part 63 Subpart H for the brine surge control vessel within the Phenol III process unit. So long as the vessel capacity and vapor pressure is below the levels specified in Table 2, the permittee shall maintain records of the vessel's capacity and vapor pressure of products contained within the vessel.

If it is determined by USEPA pursuant to 40 CFR 63.102(b) that an alternative means of compliance will achieve substantially equivalent emission reductions, or that the above-sited requirements do not apply to the brine system in the Phenol III process unit, this condition shall be of no further force and effect, and any alternative requirements shall be incorporated into the operating permit for P012.

8. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

1. The permittee shall submit a Notification of Compliance Status Report for sources subject to 40 CFR Part 63 Subpart G within 150 days of initial start-up of the Phenol III process unit and shall submit semiannual reports thereafter. The Notification of Compliance Status Report shall contain the information specified in 40 CFR 63.152(b). The first semiannual report shall be submitted no later than 8 months after the date the Notification of Compliance Status Report is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status Report is

Sunoc
PTI A

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due. Subsequent reports shall be submitted semiannually no later than 60 calendar days after the end of each 6-month period. Semiannual reports shall cover the information specified in 40 CFR 63.152 (c), and contain the start-up, shutdown, and malfunction reports required by 40 CFR 63.10 (d)(5).

2. The permittee shall submit a Notification of Compliance Status Report for sources subject to 40 CFR Part 63 Subpart H (equipment leaks provisions) no later than 90 days after the initial start-up of the Phenol III process unit. The Notification of Compliance Status Report shall contain the information specified in 40 CFR 63.182 (c). Semiannual reports shall be submitted thereafter, containing the information specified in 40 CFR 63.182 (d). The first semiannual report shall be submitted no later than 6 months after the date the Notification of Compliance Status Report is due and shall cover the 6-month period beginning on the due date of the Notification of Compliance Status Report.

3. NSPS REQUIREMENTS

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

| <u>Source No.</u> | <u>Source Description</u> | <u>NSPS Regulation (Subpart)</u> |
|-------------------|---------------------------|----------------------------------|
| P012 | Phenol III Process Unit | VV |

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

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

- 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
Authorization and Compliance Unit
P. O. Box 1049
Columbus, OH 43216-1049

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and

Portsmouth Air Pollution Group
Griffin Hall, 740 Second Street
Portsmouth, Ohio 45662

V. Testing Requirements

1. Compliance with the 99% weight-percent reduction for the catalytic incinerator shall be determined by measuring either organic HAP or TOC as specified in 40 CFR 63.116.
2. Within 150 days after the commencement of operations of the Phenol III Process Unit (P012), the permittee shall conduct a performance test in accordance with 40 CFR 63.117 and submit an Initial Notification of Compliance containing a description of the range of temperatures to be used as an indication of proper operation and maintenance of the spent air catalytic incinerator, and a definition of the "operating day" to be used for purposes of maintaining records.
3. The permittee shall verify capacities and vapor pressures per the provisions of 40 CFR 63.170 and Table 2 of 40 CFR Part 63 Subpart H for the brine surge control vessel within the new Phenol III Process Unit. So long as the vessel capacities and vapor pressures are below the levels specified in Table 2, the permittee shall maintain records of each vessels' capacity and vapor pressure of products contained within each vessel.

If it is determined by USEPA pursuant to 40 CFR 63.102(b) that an alternative means of compliance will achieve substantially equivalent emission reductions, or that the above-sited requirements do not apply to the brine system in the Phenol III process unit, this condition shall be of no further force and effect, and any alternative requirements shall be incorporated into the operating permit for P012.

4. Performance Test Requirements

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

- a. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters the proposed test procedures, and the time, date, place and person(s)

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conducting such tests.

- b. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- c. Tests shall be performed for the following source(s) and pollutant(s):

| Source | Pollutants |
|--------|-------------------------------------|
| P012 | NO _x , VOC, HAP (or TOC) |

VI. Miscellaneous Requirements

- 1. The permittee may request additional time for the submittal of the written report as required in the standard term and condition under the Performance Test Requirements heading, where warranted, with prior approval from the Portsmouth Local Air Agency.

Sunoc
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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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|---|
| P007 - Phenol II Process unit: Modification to increase allowable emissions administratively modified to include the thermal oxidizer outlet emissions limitations and to correct process vent emissions limitations This PTI supercedes PTI numbers 07-438 issued on 4/9/97 and 07-276 issued on 2/26/92. | 3745-31-05(A)(3) 3745-21-09(DD) 3745-31-11 through 3745-31-20 40 CFR Part 60, Subpart VV 40 CFR Part 60, Subpart NNN 40 CFR Part 63, Subparts A, F, G, and H | Total allowable vent emissions from Phenol II process unit shall not exceed 131.62 lbs/day VOC, 136.02 lbs/day acetone, and 24.02 TPY VOC, 24.82 TPY Acetone ³ Emissions from the thermal oxidizer shall not exceed: 0.5 lb/hr PM 2.19 TPY PM 0.1 lb/hr SO ₂ <1 TPY SO ₂ 7.5 lb/hr NO _x 32.85 TPY NO _x 4.62 lb/hr VOC 19.72 TPY VOC See section A.I.2.b through A.I.2.d below. |

* Fugitive emissions rates are estimates only and should not be considered as maximum allowable emissions rates.

2. Additional Terms and Conditions

- 2.a BAT determination: condenser, thermal oxidizer (natural gas as fuel and staged fuel design for low NO_x emissions), and wet scrubber and compliance with applicable

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requirements for HON Group 2 process vents (for existing sources) and NSPS requirements for distillation operations

- 2.b** The thermal oxidizer shall be designed, operated, and maintained so as to reduce VOC emissions from the vent stream feeds by at least 98 weight percent or to a TOC concentration of less than 20 ppmv on a dry basis corrected to 3 percent oxygen, whichever is less stringent.
- 2.c** The thermal oxidizer, including all associated equipment and piping, shall be designed and operated, and maintained so as to prevent the emissions of objectionable odors.
- 2.d** If the thermal oxidizer is used to comply with the TOC emissions limits specified in NSPS Subparts III and NNN, then Sunoco Inc. (R&M) shall comply with all the monitoring requirements, test methods, and reporting and recordkeeping requirements of Subparts III and NNN.

II. Operational Restrictions

- 1. Sunoco Inc. (R&M) shall maintain a minimum temperature of 1450 degrees Fahrenheit in the combustion zone when injecting VOC's from the oxidizer feed streams. The facility shall install, operate, and maintain a continuous temperature recorder. The sensor shall be located at the end of the combustion zone. The unit shall have a continuous display at the operating controls and an audible alarm to indicate if the temperature is less than 1450 degrees Fahrenheit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records for the leak detection and repair program requirements of 40 CFR Part 63 Subpart H in accordance with the requirements of 40 CFR 63.181.
- 2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

- 1. NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance

Sunoco Inc (RM)
PTI Application: 07 00451
Issued

Facility ID: 0773000080

Emissions Unit ID: **P007**

Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Sunoc
PTI A

Emissions Unit ID: **P007**

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| <u>Source No.</u> | <u>Source Description</u> | <u>NSPS Regulation (Subpart)</u> |
|-------------------|---|----------------------------------|
| P007 | Phenol II Process Unit: AMS distillation column | NNN |

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

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

- 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
Authorization and Compliance Unit
P. O. Box 1049
Columbus, OH 43216-1049

and

Portsmouth Air Pollution Group
Griffin Hall, 740 Second Street
Portsmouth, Ohio 45662

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| P006 - AMS Hydrogenation Process Unit: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, G, and H as applicable | 16.71 lbs/day VOC 3.05 TPY VOC |

2. Additional Terms and Conditions

- 2.a BAT determination: Vent condenser and compliance with applicable requirements for HON group 2 process vents (for existing sources)

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

- 1. Th permittee shall verify TRE index calculations, vent stream flow rate, and/or organic HAP concentration for the hydrogenation product drum and recycle compressor vent (AH01)per the applicable provisions of 40 CFR 60.115; so long as the process equipment satisfies the criteria for a group 2 process vent without additional controls. The permittee shall maintain records and submit the required semiannual reports per 40 CFR 63.117(b), 63.117(c), 63.117(d), 63.118(c), 63.118(d), 63.118(e), 63.118(g), 63.118(h), 63.118(i), and 63.118(j).
- 2. Miscellaneous HON recordkeeping requirements

Sunoco Inc (RM)
PTI Application: 07-00451
Issued

Facility ID: 0773000080

Emissions Unit ID: **P006**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

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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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: P009

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--|--|
| P009 - Phenol Wastewater Treatment Process: Modification to increase allowable emissions | 3745-31-05 (A)(3) 3745-31-11 through 3745-31-20 40 CFR Part 63, Subparts F, G, and H | 192.47 lbs/day VOC 35.13 TPY VOC 23.72 lbs/day Acetone 4.33 TPY Acetone 185.32 lbs/day Ammonia 33.82 TPY Ammonia |
| administrative modification to include 40 CFR Part 63, Subparts F, G, and H as applicable requirements and to include the MHP destruction unit venting to condensers and the DowTherm process heater as a part of the wastewater treatment process | | Emissions from the DowTherm process heater shall not exceed: 0.01 lbs/hr SO2 0.03 tpy SO2 1.89 lbs/hr VOC 8.29 tpy VOC 0.02 lbs/mmBtu particulate |

2. Additional Terms and Conditions

- 2.a BAT determination: Condensers; DowTherm process heater; Submerged fill for fixed roof process tanks shall be installed below the liquid level

II. Operational Restrictions

none

Issued: To be entered upon final issuance

III. Monitoring and/or Recordkeeping Requirements

1. Sunoco Inc. (R&M) shall maintain records as required in section 60.486(i) of 40 CFR Part 60, Subpart VV, if Sunoco Inc (R&M) applies for an exemption per section 60.480(d).

IV. Reporting Requirements

1. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
|---|--------------------------------------|--|

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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> |
|---|---|---|
| B014 - 281 MMBtu/hr natural gas fired boiler | 3745-31-05 (A)(3) 3745-17-07 (A) 3745-17-10 (B)(1) 3745-31-11 through 3745-31-20 40 CFR Part 60, Subpart Db | 0.02 lb/MMBtu PM/PM ₁₀ 67.68 lbs/day PM/PM ₁₀ 6.2 TPY PM/PM ₁₀ 0.17 lb/hr SO ₂ 0.74 TPY SO ₂ 515.00 lbs/day CO 94.0 TPY CO 0.08 lb/MMBtu NO _x 539.52 lbs/day NO _x 98.5 TPY NO _x 33.6 lb/day VOC 5.98 TPY VOC |
| administrative modification to modify the VOC and CO emission limitations to reflect the revised AP-42 emission factors for natural gas | | |

* All PM emissions can be considered to be PM₁₀ emissions.

2. Additional Terms and Conditions

- BAT determination: Low NO_x burners with flue gas recirculation and compliance with BACT requirements for NO_x control; Use of natural gas as fuel

II. Operational Restrictions

- Monitoring Requirement

A NO_x monitor shall be installed on the B014. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR part 60 - Standards of Performance for New Stationary Sources.

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Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704-.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 2. Personnel from the Ohio EPA field office shall be permitted to witness the performance test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.
2. The nitrogen oxide standards under section 40 CFR section 60.44b shall apply at all times including periods of startup, shutdown, or malfunction.
3. Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
4. The permittee shall maintain a certification letter from the Ohio EPA documenting that the NO_x continuous monitoring system has been certified in accordance with the requirements of 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.
5. The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system:
 - a. emissions of nitrogen oxides in pound/MMBtu actual heat input on an hourly average basis;
 - b. emissions of nitrogen oxides in pound/MMBtu actual heat input on a rolling, 30-day average basis; and
 - c. results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
6. The permittee shall maintain a daily record of the "F" factor used in the calculation of the rolling, 30-day average nitrogen oxides emission rate. The record shall also identify the method used to determine the "F" factor.

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Sunoco Inc (RM)

PTI Application: 07-00451

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Facility ID: 0773000080

Emissions Unit ID: B014

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IV. Reporting Requirements

1. Prior to the installation of the continuous nitrogen oxides 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 for approval by the Ohio EPA, Central Office.
2. In accordance with OAC rule 3745-15-04, all copies of the certification test results for B014 shall be submitted to the Portsmouth Local Air Agency and the OEPA, Central Office within 30 days after the test is completed.
3. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Portsmouth Local Air Agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of any rolling, 30-day average nitrogen oxides values in excess of the applicable nitrogen oxides emission limitation (lb/MMBTU).
4. The reports shall also document any continuous nitrogen oxide monitoring system downtime while the emissions unit was on line (date, time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective actions(s) taken for each time period of emissions unit and control equipment malfunction. The total operating time of the emissions unit was on line shall also be included in the quarterly report.
5. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.
6. These quarterly excess emissions reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall be addressed the data obtained during the previous calendar quarter.
7. The permittee shall submit notification of the date of initial startup of B014, as provided by 40 CFR Section 60.7.
8. NSPS REQUIREMENTS

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

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CFR Part 60.

Emissions Unit ID: **B014**

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Emissions Unit ID: **B014**

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| <u>Source No.</u> | <u>Source Description</u> | <u>NSPS Regulation (Subpart)</u> |
|-------------------|---------------------------------------|----------------------------------|
| B014 | 281 MMBTU/hr Natural Gas Fired Boiler | Db |

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

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

- 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
Authorization and Compliance Unit
P. O. Box 1049
Columbus, OH 43216-1049

and

Portsmouth Air Pollution Group
Griffin Hall, 740 Second Street
Portsmouth, Ohio 45662

V. Testing Requirements

1. Within 60 days after achieving the maximum production rate at which B014 will be operated, but not later than 180 days after its initial startup, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60. Personnel from the Portsmouth Local Air Agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests.
2. Compliance with the allowable mass emission rate for nitrogen oxides shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Parts 60.46b and 60.48b.

After the initial compliance demonstration required pursuant to 40 CFR Parts 60.46b and 60.8 is completed, compliance with the nitrogen oxides lb/MMBTU emission limitation shall be

determined on a continuous basis through the use of a rolling, 30-day average emission rate calculated from the hourly average data obtained by the continuous nitrogen oxides monitoring system. A new rolling 30-day average emission rate is calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emissions data for the preceding 30 steam generating unit operating days.

- 3. Certification of the continuous nitrogen oxides monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60.

4. Performance Test Requirements

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

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

| Source | Pollutants |
|--------|---|
| B014 | NO _x , PM/PM ₁₀ , VOC |

VI. Miscellaneous Requirements

none

Sunoc

PTI A

Emissions Unit ID: B014

Issued: To be entered upon final issuance**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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions**2.a****II. Operational Restrictions**

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc

PTI A

Emissions Unit ID: J001

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| J001 - Acetone, alphamethylstyrene, and aniline barge loading: Modifications to increase allowable emissions | 3745-31-05 (A)(3) | 0.45 TPY VOC 104.48 TPY Acetone |

2. Additional Terms and Conditions

- 2.a BAT Determination: Submerged fill

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

Sunoco Inc (RM)
PTI Application: 07 00451
Issued

Facility ID: 0773000080

Emissions Unit ID: **J001**

none

VI. Miscellaneous Requirements

none

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Emissions Unit ID: J001

Issued: To be entered upon final issuance**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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: J004

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---|--|
| J004 - Acetone, alphasethylstyrene, and aniline railcar loading Modifications to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 12.94 TPY VOC 303.0 TPY Acetone |

2. Additional Terms and Conditions

- 2.a BAT Determination: Compliance with allowable mass emissions and Additional Special Terms and Conditions of this permit; Compliance with applicable requirements for HON Group 2 transfer racks

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall record, update annually, and maintain the following records to verify that the Rail Car Loading Facility (J004) and the Tank Truck Loading Facility (J006) retain their Group 2 status under 40 CFR Section 63.126:
 - a. an analysis demonstrating the design and actual annual throughput of each transfer rack;

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- b. an analysis documenting the weight-percent organic HAP's in the liquid loaded at each transfer rack. Examples of acceptable documentation include but are not limited to analyses of the material and engineering calculations.
- c. An analysis documenting the annual rack weighted average HAP partial pressure of each transfer rack. (For Group 2 transfer racks that are limited to transfer of organic HAP's with partial pressures less than 10.3 kilopascals, documentation is only required of the organic HAP's (by compound) that are transferred. The rack weighted average partial pressure does not need to be calculated.)

No other provisions of 40 CFR Part 63 Subpart F, G, or H for transfer racks apply to the Group 2 transfer rack.

2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: **J006**

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| J006 - Acetone, alphasethylstyrene and phenol tank truck loading Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 12.94 TPY VOC 303.0 TPY Acetone |

2. Additional Terms and Conditions

- 2.a BAT Determination: Compliance with allowable mass emissions and Additional Special Terms and Conditions of this permit; Compliance with applicable requirements for HON group 2 transfer racks

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall record, update annually, and maintain the following records to verify that the Rail Car Loading Facility (J004) and the Tank Truck Loading Facility (J006) retain their Group 2 status under 40 CFR Section 63.126:
 - a. an analysis demonstrating the design and actual annual throughput of each transfer rack;

Issued: To be entered upon final issuance

- b. an analysis documenting the weight-percent organic HAP's in the liquid loaded at each transfer rack. Examples of acceptable documentation include but are not limited to analyses of the material and engineering calculations.
- c. An analysis documenting the annual rack weighted average HAP partial pressure of each transfer rack. (For Group 2 transfer racks that are limited to transfer of organic HAP's with partial pressures less than 10.3 kilopascals, documentation is only required of the organic HAP's (by compound) that are transferred. The rack weighted average partial pressure does not need to be calculated.)

No other provisions of 40 CFR Part 63 Subpart F, G, or H for transfer racks apply to the Group 2 transfer rack.

2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: **J006**

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: T023

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|---|
| T023 - 1,504,000 gallon fixed roof storage tank for cumene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 5.86 TPY VOC |

2. Additional Terms and Conditions

- 2.a** BAT Determination: Submerged fill compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T023**

least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: T024

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|---|
| T024 - 1,504,000 gallon fixed roof storage tank for cumene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subpart A, F, and G as applicable | 5.86 TPY VOC |

2. Additional Terms and Conditions

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: **T024**

least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: T024

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|---|
| T025 - 993,000 gallon fixed roof storage tank for phenol: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 4.93 TPY VOC |

2. **Additional Terms and Conditions**

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoc**PTI A**Emissions Unit ID: **T025****Issued: To be entered upon final issuance**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: T025

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|---|
| T026 - 993,000 gallon fixed roof storage tank for phenol: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 4.93 TPY VOC |

2. **Additional Terms and Conditions**

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T026**

2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---|--|
| T033 - 2,086,000 gallon fixed roof storage tanks for cumene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 7.96 TPY VOC |

2. **Additional Terms and Conditions**

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T033**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---|---|
| T034 - 977,600 gallon fixed roof storage tanks for phenol: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 5.06 TPY VOC |

2. Additional Terms and Conditions

- 2.a** BAT Determination: Submerged fill; Compliance with applicable requirements for HON Group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T034**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--|---|
| T035 - 249,671 gallon fixed roof storage tank for alphasethylstyrene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subpart A, F, and G as applicable | 0.21 TPY VOC |

2. Additional Terms and Conditions

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for HON group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.

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- 2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: T039

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| T039 - 1,015,112 gallon fixed roof storage tank for cumene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 4.94 TPY VOC |

2. Additional Terms and Conditions

- 2.a** BAT Determination: Submerged fill; Compliance with applicable requirements for HON group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period

Issued: To be entered upon final issuance

different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--|--|
| T049 - 249,671 gallon fixed roof storage tank for alphasethylstyrene: Modification to increase allowable emissions | 3745-31-05 (A)(3) 40 CFR Part 63 Subparts A, F, and G as applicable | 0.22 TPY VOC |

2. Additional Terms and Conditions

- 2.a** BAT Determination: Submerged fill; Compliance with applicable requirements for HON group 2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T049**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| T059 11,844 gallon hydrogenation feed tank: Modification to increase allowable emissions | 3745-31-05(A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable 40 CFR Part 60, Subpart Kb | 1.11 TPY VOC |

2. **Additional Terms and Conditions**

- 2.a BAT Determination: Vent condenser and submerged fill; Compliance with applicable requirements for HON Group2 storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: **T059**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. **Additional Terms and Conditions**

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--|--|
| T064 41,130 gallon fixed roof storage tank for Hydrogenation AMS | 3745-31-05(A)(3) 40 CFR Part 63, Subparts A, F, and G as applicable | 6.55 TPY |

2. **Additional Terms and Conditions**

- 2.a BAT Determination: Submerged fill; Compliance with applicable requirements for group 2 HON storage vessels

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records showing the dimensions of the storage vessel(s) and an analysis showing the capacity of the storage vessel as required by 40 CFR 63.123(a). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. For each Group 2 storage vessel, the permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.
2. Miscellaneous HON recordkeeping requirements

Sunoc**PTI A**Emissions Unit ID: **T064****Issued: To be entered upon final issuance**

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of all applicable reports and records required by subparts F, G, and H of 40 CFR Part 63 for at least 5 years; except that, if subparts G or H require records to be maintained for a time period different than 5 years, those records shall be maintained for the time specified in those subparts.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoc
PTI A

Emissions Unit ID: T064

Issued: To be entered upon final issuance

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> |
|---|--------------------------------------|--|
| | None | None |

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Sunoco Inc (RM)

Facility ID: 0773000080

PTI Application: 07-00451

Issued: To be entered upon final issuance

Emissions Unit ID: T064

ADMINISTRATIVE MODIFICATION

inter-office communication

to: DAPC, Air Quality Modeling and Planning
from: Patty Centofanti, Portsmouth Local Air Agency
subject: Administrative Modification of Permit To Install 07-451
date: March 13, 2002

Choose one:

Initiated by: Permittee DO/laa This modification is the result of an appeal to the Environmental Review Appeals Commission*Please fill out the following:***SUMMARY (for informational purposes only)****TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|---------------------|--|
| VOC (vent) | 156.46 (net increase of 47.29) |
| VOC (fugitive) | 83.27 (net increase of 33.57) |
| Acetone (vent) | 30.05 (net increase of 9.05) |
| Acetone (fugitive) | 725.17 (net increase of 160.54) |
| NOx | 106.04 |
| SO ₂ | 0.74 |
| PM/PM ₁₀ | 6.2 |
| CO | 94.0 |
| Ammonia | 33.82 (net increase of 13.26)* |

*Ammonia limits proposed reflect a change in the method of emissions estimation.

Issued: To be entered upon final issuance

Please provide a fairly detailed description of the basis for the modification and how the permit is being modified:

The following modifications, requested by Sunoco Inc. (R&M), are listed by emissions unit:

P012 Phenol III Process Unit

Administrative modification to correct the Acetone emissions limit from the catalytic oxidizer. The engineering estimates provided in the permit to install application were lower than the actual emissions measured during the initial performance test on April 26, 2000.

Original Limit = 0.10 lb/day and 0.02 tpy Acetone

New Limit = 4.93 lb/day and 0.90 tpy Acetone

Since the acetone emissions are still less than one tpy no air toxics modeling is required.

P007 Phenol II Process Unit

Administrative modification to correct the process vent emission limits:

- Crude AMS is produced as a by product of Phenol production. The AMS is then refined in the AMS section of the Phenol II process unit. The installation of the Phenol III process unit increased the quantity of crude AMS to be processed. In order to handle this increase Sunoco originally proposed to install a new distillation column (3521-F). By changing the operating pressure of the existing AMS Product distillation column (3502-E), the efficiency of the process unit increased. Therefore, the new AMS distillation column (3521-F) was never installed. The increase in emissions in the AMS section of Phenol II was strictly due to the increased throughput. This administrative modification corrects the emissions limitations to exclude egress point P226 for the column that was not installed.

- The VOC and Acetone emission limits for the process vents were also changed due to the contribution from the AMS Supertopper distillation column. Sunoco requested this modification after reviewing the results of testing. Emissions estimates in the PTI application were calculated using AP-42 emission factors for tank breathing and working losses. Spent air purges which keep the pressure indicators from plugging were not accounted for in the emissions estimates. The test results showed emissions to be 0.686 lbs/day of VOC and 0.34 lb/day Acetone.

Administrative modification also includes the BAT limits for the thermal oxidizer. The thermal oxidizer is a control device for Phenol II (P007) and Cumene Oxidation (P001). In this PTI, the thermal oxidizer was identified as a control device for the Phenol II process unit in the BAT Determination column of the Air Emissions Summary table but the limits for the thermal oxidizer were not included. The thermal oxidizer was originally permitted as emissions unit

Issued: To be entered upon final issuance

NOO1 in PTI 07-276, issued on 4/28/93. Since the thermal oxidizer is actually a control device not an emissions unit, it should not have been permitted separately, but as part of the process units which it controls.

The minimum firebox temperature of thermal oxidizer changed from 1500 (from PTI 07-276) to 1450 degrees Fahrenheit based upon the average temperature during the most recent test which demonstrated compliance in June 2000.

P009 Phenol Wastewater Treatment Process

Administrative modification to include 40 CFR Part 63, Subparts F, G, and H as applicable requirements for emissions unit P009.

Administrative modification to include the MHP destruction unit as part of the Wastewater Treatment Plant (WWTP). The MHP destruction unit was originally permitted in PTI 07-311 as part of emissions unit P001 (Cumene Oxidation). MHP in the wastewater from the oxidation process is toxic to the bugs in the biological WWTP; therefore, the MHP destruction unit is actually a treatment to the wastewater from cumene oxidation.

Original Limit for P009 from 07-451 = 188.87 lbs/day and 34.47 tpy VOC

Original Limit for MHP Destruction from 07-311 = 0.15 lb/hr and 0.66 tpy VOC

New Limit for P009 = 192.47 lb/day and 35.13 tpy VOC

Note: 40 CFR Part 60, Subpart RRR was not listed as an applicable requirement for the WWTP and the special terms and conditions of PTI 07-311 regarding Subpart RRR were not incorporated into this PTI. The MHP reactor is not an affected facility as described in 40 CFR 60.700 (the WWTP does not produce a chemical listed in 60.707 as product, co-product, by-product or intermediate).

B014 281 MMBtu/hr Natural Gas fired Boiler

Administrative modification to change the VOC limits for the natural gas fired boiler to reflect the revised AP-42 emission factors for natural gas. AP-42 emission factors for natural gas were updated in Feb 1998 changing from 1.4 lb VOC/mmscf to 5.5 lb VOC/mmscf.

Original Limit = 9.6 lbs/day and 1.74 TPY VOC

New Limit = 33.6 lbs/day and 5.98 TPY VOC

The CO limits for the natural gas fired boiler are also being administratively modified based upon the revised AP-42 emission factors for natural gas. AP-42 emission factors for natural gas were updated in Feb 1998 changing from 40 lb CO /mmscf to 84 lb CO/mmscf.

Original Limit = 101.76 lbs/day and 49.23 TPY CO

New Limit = 515.00 lbs/day and 94.0 TPY CO

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Emissions Unit ID: T064

J006 Acetone, alphas-methylstyrene and phenol tank truck loading

Administrative modification to include 3745-31-05 as an applicable requirement in emissions unit J006. Was omitted from the original PTI due to a typographical error.

T059 Hydrogenation Feed Tank

Administrative modification to include 40 CFR Part 60, Subpart Kb as an applicable requirement. Was omitted from the original PTI due to a typographical error.

Modeling Requirements

Since this facility is subject to a MACT standard, air toxics modeling is not required for the air toxics regulated by the MACT. The acetone increase at Phenol III is less than one ton per year therefore modeling is not required. (Acetone is an air toxic but not regulated by the MACT.)

The CO emissions increase due to the boiler (B014) were less than 100 tpy therefore not subject to state modeling requirements.

Sunoco Inc (RM)

PTI Application: 07-00451

Issued: To be entered upon final issuance

Facility ID: 0773000080

Sunoco Inc (RM)

PTI Application: 07-00451

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