



State of Ohio Environmental Protection Agency

**RE: FINAL 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: 7/27/2004

Sunoco Inc (RM)
Jim Fain
1019 Haverhill-Ohio Furnace Rd
Haverhill, OH 45629-9999

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA

PCHD



**Permit To Install
Terms and Conditions**

**Issue Date: 7/27/2004
Effective Date: 7/27/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 07-00451

Application Number: 07-00451
APS Premise Number: 0773000080
Permit Fee: **\$2000**
Name of Facility: Sunoco Inc (RM)
Person to Contact: Jim Fain
Address: 1019 Haverhill-Ohio Furnace Rd
Haverhill, OH 45629-9999

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

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

declared invalid.

6. General Requirements

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

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

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Termination of Permit To Install

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

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

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

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)	81.27 (net increase of 33.57)
Acetone (vent)	30.05 (net increase of 9.05)
Acetone (fugitive)	723.17 (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.

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions****I. Applicable Emission Limitations and/or Control Requirements Pertaining to Facility-wide Fugitive Equipment Leaks:****1. Applicable Rules and Emission Limitations:**

OAC rule 3745-31-05(A)(3) VOC emissions from facility-wide fugitive equipment leaks shall not exceed 147.80 tons per year.

Acetone emissions from facility-wide fugitive equipment leaks shall not exceed 73.89 tons per year.

Ammonia emissions from facility-wide fugitive equipment leaks shall not exceed 183.31 tons per year.

40 CFR Part 63, Subpart H See section A.III. below.

40 CFR Part 60, Subpart VV See section below.

OAC rule 3745-21-09(DD) See section below.

2. Additional Terms and Conditions

2.a Modifications of the equipment at this facility shall not require a PTI pursuant to OAC Chapter 3745-31 that result of increases in fugitive emissions unless and until the calculated facility-wide PTE for fugitive emissions equals or exceeds the appropriate facility-wide allowable fugitive emission limit in A.I.1.

2.b The permittee shall consider only those fugitive emissions from the emissions unit being installed or modified (i.e., not the facility-wide fugitive equipment limit) when determining applicability under OAC rule 3745-31-11 through OAC rule 3745-31-20.

2.c In accordance with section A.3 of Part II – Facility Specific Terms and Conditions, the permittee shall maintain a leak detection and repair (LDAR) program for equipment in organic hazardous air pollutant (HAP) service at the facility.

The leak detection and repair program pertains to any type of pump, compressor, agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector, and instrumentation system in organic HAP service at the facility.

2.d In accordance with 40 CFR Part 60, Subpart VV, the permittee shall maintain a LDAR

program for equipment in volatile organic compound (VOC) service at the facility.

The leak detection and repair program pertains to any type of pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, flange, connector, closed vent system, and any other device or system in volatile organic compound service at the facility.

For equipment which are subject to the provisions of 40 CFR Part 60, Subpart VV and also subject to section A.3 of Part II – Specific Facility Terms and Conditions, the permittee is required only to comply with section A.3 of Part II – Specific Facility Terms and Conditions. The provisions in 40 CFR 63.1(a)(3) of Subpart A do not alter the provisions in this section.

For equipment in VOC service which are subject to 40 CFR Part 60, Subpart VV, but are not subject to section A.3 of Part II - Specific Facility Terms and Conditions, the permittee has elected to apply section A.3 of Part II - Specific Facility Terms and Conditions to all such equipment in the process unit, in accordance with section A.3.d of Part II - Specific Facility Terms and Conditions. All VOC in such equipment shall be considered, for purposes of applicability and compliance with section A.3 of Part II - Specific Facility Terms and Conditions as if it were organic HAP. Compliance with the provisions of section A.3 of Part II - Specific Facility Terms and Conditions, in the manner described in this section, shall be deemed to constitute compliance with 40 CFR Part 60, Subpart VV.

- 2.e** In accordance with OAC rule 3745-21-09(DD), the permittee shall maintain a LDAR program for equipment in VOC service within this emissions unit. Consistent with U.S. EPA streamlining policy, the permittee has elected to demonstrate compliance with OAC rule 3745-21-09(DD) by demonstrating compliance with the equipment leak standards in section A.3 of Part II – Specific Facility Terms and Conditions and considering all VOC as if it were organic HAP. The requirements in section A.3 of Part II – Specific Facility Terms and Conditions are generally more stringent than the LDAR requirements of OAC rule 3745-21-09(DD).

3. Operational Restrictions

None

4. Monitoring and/or Recordkeeping

1. Monitoring for the LDAR program shall comply with Method 21 of 40 CFR Part 60,

Appendix A, as specified in section A.3.za of Part II - Specific Facility Terms and Conditions.

The permittee shall maintain records for the LDAR program in accordance with the requirements of section A.3.zb of Part II - Specific Facility Terms and Conditions.

5. Reporting Requirements

1. The permittee shall submit semi-annual reports for the LDAR program for equipment in accordance with the requirements of section A.3.zc.iv of Part II - Specific Facility Terms and Conditions.
2. Reports required by sections A.1, A.2, and A.3 of Part II - Specific Facility Terms and Conditions shall be submitted to USEPA Region 5, with a copy to the Portsmouth Local Air Agency, in accordance with section A.1.m.iii of Part II - Specific Facility Terms and Conditions.

6. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- 1.a Emission Limitation -

VOC emissions from facility-wide fugitive equipment leaks shall not exceed 147.80 tons per year.

Acetone emissions from facility-wide fugitive equipment leaks shall not exceed 73.89 tons per year.

Ammonia emissions from facility-wide fugitive equipment leaks shall not exceed 183.31 tons per year.

Applicable Compliance Method:

The facility-wide PTE fugitive emissions shall be calculated using the following methodology:

The facility-wide PTE fugitive emissions are based upon the sum of PTE fugitive emissions from components in each emissions unit at the facility. These components include all valves, pumps, pressure relief valves, connectors, open-ended lines, and sampling connections in regulated service at the facility. PTE fugitive emissions are calculated using the facility component count, component service type, and PTE fugitive emission factors.

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PTE fugitive emission factors are calculated utilizing synthetic organic chemical manufacturing industry (SOCMI) Screening Ranges Emission Factors and SOCMI Average Emission Factors as listed in U.S. EPA's "Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017). The service type for each component is determined according to the definitions contained in the SOCMI NESHAP (CFR 63 Subpart H) for gas, light liquid, and heavy liquid service. For the purposes of regulatory overlap (applicability and compliance) with 40 CFR NSPS Subpart VV and OAC 3745-21-09(DD), all VOC in such equipment at the facility is considered as if it were organic HAP.

The PTE fugitive emission factors for monitored components in light liquid and gas/vapor service are calculated using the SOCMI Screening Ranges Emission Factors and "potential to emit" leak rates. A leak rate of 0.5% for pumps in light liquid service and a leak rate of 0.1% for all other monitored components in light liquid and gas/vapor service is used to calculate "potential to emit" leak rates. PTE fugitive emission factors are then calculated for each component type based on the SOCMI Screening Ranges Emission Factors and the "potential to emit" leak rates using the following equation:

$$\text{PTE Fugitive Emission Factor} = \text{PTE Leak Rate} * (>10,000 \text{ ppm Screening Ranges Emission Factor}) + (1 - \text{PTE Leak Rate}) * (<10,000 \text{ ppm Screening Ranges Emission Factor})$$

This same methodology is used to calculate the PTE fugitive emission factors for all components in heavy liquid service using a "potential to emit" leak rate of 0.1%. The PTE fugitive emission factors for unmonitored components in light liquid and gas/vapor service (i.e. components in acetone or ammonia service that are not required to be monitored by any applicable regulations) are set equal to the SOCMI Average Emission Factors. The table below lists the SOCMI Screening Ranges and Average Emissions Factors, the leak rate (if any), and the resulting PTE fugitive emission factor for each component type.

The PTE fugitive emissions can be calculated by multiplying all the components in a given service type by the respective PTE fugitive emission factor as listed in the table below. The summation of emissions from all components in each service type is the facility-wide PTE fugitive emissions.

	Service Component	Screening Concentrations 10,000 ppm lb/hr	Screening Concentrations < 10,000 ppm lb/hr	Assumed % of components Leaking for Year (%)	Facility PTE Emission Factor Set lb/hr
Monitored Gas/Vapor and Light Liquid Components	Gas/Vapor				
	Valves	0.172	0.000289	0.1	0.000461
	Compressor Seals	3.545	0.197	0.1	0.2003
	Pressure Relief Valves	3.728	0.0985	0.1	0.1021
	Connectors (Flanges)	0.249	0.00018	0.1	0.000429
	Open-Ended Lines	0.0264	0.0033	0.1	0.00332
	Sampling Connections	-	-	Default to Average Factor	0.0331
	Light Liquid				
	Valves	0.197	0.000364	0.1	0.000561
	Pump Seals/Agitator Seals	0.536	0.0041	0.5	0.00676
Connectors (Flanges)	0.249	0.00018	0.1	0.000429	
Open-Ended Lines	0.02635	0.0033	0.1	0.00332	
Sampling Connections	-	-	Default to Average Factor	0.0331	
Unmonitored Heavy Liquid Components	Heavy Liquid				
	Valves	0.00051	0.00051	0.1	0.00051
	Pump Seals	0.476	0.0046	0.1	0.00507
	Connectors (Flanges)	0.249	0.00018	0.1	0.000429
	Open-Ended Lines	0.02635	0.0033	0.1	0.00332
Sampling Connections	-	-	Default to Average Factor	0.0331	
		Facility PTE Emission Factor Set equal to SOCMI Average Emission Factors			
		lb/hr			
Unmonitored Light Liquid and Gas/Vapor Components	Gas/Vapor				
	Valves	0.0132			
	Compressor Seals	0.503			
	Pressure Relief Valves	0.229			
	Connectors (Flanges)	0.00403			
	Open-Ended Lines	0.0037			
	Sampling Connections	0.0331			
	Light Liquid				
	Valves	0.00888			
	Pump Seals/Agitator Seals	0.0439			
Connectors (Flanges)	0.00403				
Open-Ended Lines	0.0037				
Sampling Connections	0.0331				

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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. Total allowable emissions from the Phenol III process unit process vessels shall not exceed 4.32 TPY Acetone. 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;

Fugitive emissions shall be minimized by implementing the applicable 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.

***** 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

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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

Emissions Unit ID: **P012**

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 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,

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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

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

Emissions Unit ID: P012

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) 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
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Sunoco

PTI A₁

Modification Issued: 7/27/2004

Emissions Unit ID: **P012**

P012

NO_x, VOC, HAP (or TOC)

23

Sunoco

PTI A₁

Modification Issued: 7/27/2004

Emissions Unit ID: **P012**

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.

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 and 07-442 issued on 08/06/97.	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 Emissions from the thermal oxidizer shall not exceed: 0.5 lb/hr PM 2.19 TPY PM 0.1 lb/hr SO2 <1 TPY SO2 7.5 lb/hr NOx 32.85 TPY NOx 3.49 lb/hr VOC 15.29 TPY VOC See section A.I.2.b through A.I.2.d below.

2. Additional Terms and Conditions

- 2.a BAT determination: condenser, thermal oxidizer (natural gas as fuel and staged fuel design for low NOx emissions), and wet scrubber and compliance with applicable requirements for HON Group 2 process vents (for existing sources) and NSPS requirements for distillation operations

Modification Issued: 7/27/2004

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

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Sunoco

PTI A1

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Emissions Unit ID: **P007**

Sunoco Inc (RM)
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Modif

Facility ID: 0773000080

Emissions Unit ID: P007

<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

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

Modification Issued: 7/27/2004

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. The 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

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

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 SO ₂ 0.03 tpy SO ₂ 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

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

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>
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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>
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

- 2.a** 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

1. 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**

Modif

Facility ID: **0773000080**

Emissions Unit ID: **B014**

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 CFR Part 60.

<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

Emissions Unit ID: B014

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

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

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, alphas-methylstyrene, 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

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Facility ID: 0773000080

Emissions Unit ID: J001

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

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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

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, alphas-methylstyrene 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;
 - 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

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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

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>
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

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

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 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.
- 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.

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Emissions Unit ID: **T023**

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

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 least

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Emissions Unit ID: **T024**

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

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

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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

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>
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

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

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 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.
- 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

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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

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

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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.

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Emissions Unit ID: **T033**

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

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

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Emissions Unit ID: **T034**

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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.

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Facility ID: **0773000080**

Emissions Unit ID: **T034**

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

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.
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

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 or crude AMS: Modification to increase allowable emissions This PTI supercedes PTI number 07-232 issued on 2/27/91.	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

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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 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

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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

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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

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

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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

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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

The permittee of sources subject to subparts F, G, and H of 40 CFR Part 63 shall keep copies of

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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.

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Emissions Unit ID: **T064**

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