



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 07-00451

Fac ID: 0773000080

DATE: 2/25/2008

Sunoco Inc (RM)
Melissa Essman
1019 Haverhill-Ohio Furnace Rd
Haverhill, OH 45629-9999

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA

PCHD



**Permit To Install
Terms and Conditions**

**Issue Date: 2/25/2008
Effective Date: 2/25/2008**

FINAL PERMIT TO INSTALL 07-00451

Application Number: 07-00451
Facility ID: 0773000080
Permit Fee: **\$1000**
Name of Facility: Sunoco Inc (RM)
Person to Contact: Melissa Essman
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):
Chapter 31 modification to include routing the Methyl Hydroperoxide (MHP) Destruction Reactor (2472-D) vent stream to the Regenerative Thermal Oxidizer (RTO) instead of the Dowtherm (305-LA).

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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.

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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 re-issuance, or modification
- 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, 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 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.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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.

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- 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 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.

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12. Air Pollution Nuisance

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

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, 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.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), 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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (vent)	156.5
VOC (fugitive)	81.27
Acetone (vent)	30.05
Acetone (fugitive)	723.17
NO _x	106.04
SO ₂	0.74
PM/PM ₁₀	6.2
CO	94.0
Ammonia	33.82

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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:

See Part II, section A.I of the Sunoco Inc. (R&M) Permit to Install # 07-00500, modified May 4, 2006 or the subsequent amendments or modifications thereto.

II. Requirements of 40 CFR Part 63, Subpart A

See Part II, section A.III and Attachment 1 (Table 3) of the Sunoco Inc. (R&M) Permit to Install # 07-00500, modified May 4, 2006 or the subsequent amendments or modifications thereto.

III. Incorporation of 40 CFR Part 63, Subparts F, G, and H

See Part II, section A.V and Attachments 1, 2, and 3 of the Sunoco Inc. (R&M) Permit to Install # 07-00500, modified May 4, 2006 or the subsequent amendments or modifications thereto.

IV. Incorporation of 40 CFR Part 61, Supart FF

See Part II, section A.IV of Sunoco Inc. (R&M) Permit to Install # 07-00500, modified May 4, 2006 or the subsequent amendments or modifications thereto.

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - P006 - alphas-methylstyrene hydrogenation process unit with the following air pollution control devices: condenser (3516-C); administrative modification to place terms into new PTI format and to update with most recent Title V permit terms and conditions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions from all equipment except fugitive equipment leaks shall not exceed 16.71 pounds per day and 3.05 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, sections A.I and A.III.
40 CFR Part 60, Subpart VV	See Part II, section A.I.
OAC rule 3745-21-09(DD)	See Part II, section A.I.

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

1. The average temperature of the liquid ammonia coolant in the condenser (3516-C), on

a daily basis, shall not be greater than 41 degrees Fahrenheit.

2. Each surge control vessel or bottoms receiver tank which meets one of the conditions listed in 40 CFR 63.170 [see Part II, section A.III] shall be equipped with a closed vent system that routes the organic vapors from the surge control vessel or bottoms receiver tank back to the process or to a control device that complies with the requirements of 40 CFR 63.172 [see Part II, section A.III] or shall be equipped with a fixed roof and an internal floating roof or an external floating roof.

In accordance with the permittee's permit application, the following surge control vessels and bottoms receiver tanks, do not exceed the threshold triggers of 40 CFR 63.170 [see Part II, section A.III]. Therefore, these vessels are not required to meet the conditions listed in 40 CFR 63.170 [see Part II, section A.III] at the time of permit issuance: 3510-F.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the liquid ammonia coolant in the condenser (3516-C) at least once every 15 minutes when the AMS Hydrogenation process unit is in operation. The equipment used to monitor temperature must have a minimum accuracy of (a) +/- 1 percent of the temperature being monitored expressed in degrees Celsius ($^{\circ}\text{C}$) or (b) +/- 0.5 degrees ($^{\circ}\text{C}$), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day the AMS Hydrogenation process unit is in operation:

- a. the average temperature of the liquid ammonia coolant in the condenser (3516-C) on a daily calendar basis; and
 - b. a log or record of downtimes for the capture (collection) system, control device, monitoring equipment, and the AMS Hydrogenation process unit.
2. Whenever process changes are made that could reasonably be expected to change a Group 2 process vent to a Group 1 process vent, the permittee shall recalculate the TRE index value, flow, or organic HAP concentration as necessary to determine if the vent is Group 1 or Group 2 in accordance with 40 CFR 63.115(e) [see Part II, section

A.III].

The permittee shall maintain records of process vent group determinations in accordance with 40 CFR 63.117 and 40 CFR 63.118(c), (d), and (e) [see Part II, section A.III].

3. The permittee shall maintain procedures for the management of maintenance wastewater in accordance with 40 CFR 63.105(a) [see Part II, section A.III].
4. The permittee shall maintain records for benzene waste operations in accordance with the requirements specified in 40 CFR 61.356 [see Part II, section A.IV].

IV. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all periods during which the average temperature of the liquid ammonia coolant in the condenser (3516-C) on a daily calendar basis exceeded the temperature limitation specified above.
2. The permittee shall submit periodic reports in accordance with 40 CFR 63.152(c) [see Part II, section A.III]. The periodic reports shall be submitted semiannually no later than 60 calendar days after the end of each 6-month period. The reports shall include all information specified in 40 CFR 63.117 and 40 CFR 63.118 [see Part II, section A.III] for process vents and all information specified in 40 CFR 63.146 [see Part II, section A.III] for process wastewater, including reports of periods when monitored parameters are outside their established ranges.
3. The permittee shall submit reports of start-up, shutdown, and malfunction in accordance with 40 CFR 63.10(d)(5) [see Part II, section A.II] and 40 CFR 63.152(d)(1) [see Part II, section A.III]. The semiannual start-up, shutdown and malfunction reports may be submitted on the same schedule as the periodic reports required under 40 CFR 63.152(c) [see Part II, section A.III] instead of the schedule specified in 40 CFR 63.10(d)(5) [see Part II, section A.II].
4. Whenever the recalculations (performed when process changes are made that could reasonably be expected to change a Group 2 process vent to a Group 1 process vent) determine that one of the criteria below has been met, the permittee shall submit a report as specified in 40 CFR 63.118(g), (h), (i), and (j) [see Part II, section A.III] and the permittee shall comply with the appropriate provisions in 40 CFR 63.113 [see Part II, section A.III] by the dates specified in 40 CFR Part 63, Subpart F [see Part II, section A.III].
 - a. the recalculated TRE index value is less than or equal to 1.0;

Emissions Unit ID: P006

- b. the recalculated TRE index value is less than or equal to 4.0 but greater than 1.0;
 - c. the recalculated flow rate is greater than or equal to 0.005 standard cubic meter per minute; or
 - d. the recalculated concentration is greater than or equal to 50 parts per million by volume.
5. The permittee shall submit reports for benzene waste operations in accordance with the requirements specified in 40 CFR 61.357 [see Part II, section A.IV].
 6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
 7. Reports required by 40 CFR Part 63, Subparts F, G, and H [see Part II, section A.III] shall be submitted to USEPA Region 5, with a copy to the Portsmouth Local Air Agency, in accordance with 40 CFR 63.103(d) and (d)(1) [see Part II, section A.III].

V. Testing Requirements

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

1.a Emission Limitation:

Volatile organic compound emissions from all equipment except fugitive equipment leaks shall not exceed 16.71 pounds per day.

Volatile organic compound emissions from all equipment except fugitive equipment leaks shall not exceed 3.05 tons per year.

Applicable Compliance Method:

The volatile organic compound emissions (potential to emit) from the following equipment as listed below shall be summed.

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

Equipment ID	Equipment Description	Egress Point	Control Device	VOC (lb/day)	VOC (tpy)	Notes
3512-F	Hydrogenation product drum	AH01	3516-C Condenser	16.71	3.05	1

Sunoco

PTI A

Issued: 2/25/2008

Emissions Unit ID: **P006**

1. VOC emissions (lb/hr and tpy) from this equipment are controlled. The VOC emissions include the emissions reductions due to the control device. These values represent the potential to emit and are identified in previous application submittals (PTI 07-00451). Individual equipment VOC (lb/hr and tpy) values are not independently enforceable in this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - P009 - phenol wastewater treatment plant with the following air pollution control devices: condenser (2473-C), process heater (305-LA); Chapter 31 modification administrative modification to place terms into new PTI format and to update with most recent Title V permit terms and conditions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks, shall not exceed 192.47 pounds per day and 35.13 tons per year.</p> <p>Acetone emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks, shall not exceed 23.72 pounds per day and 4.33 tons per year.</p> <p>Ammonia emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks, shall not exceed 185.32 pounds per day and 33.82 tons per year.</p> <p>Total volatile organic compound emissions (including acetone) from the regenerative thermal oxidizer, for all equipment vented to the regenerative thermal oxidizer, shall not exceed 6.17 pounds per hour and 27.02 tons per year, as a rolling, 12-month summation from the regenerative thermal oxidizer stack.</p>

	<p>Total particulate emissions from the regenerative thermal oxidizer, for all equipment vented to the regenerative thermal oxidizer, shall not exceed 0.68 pound per hour and 3.0 tons per year.</p> <p>Total nitrogen oxides emissions from the regenerative thermal oxidizer, for all equipment vented to the regenerative thermal oxidizer, shall not exceed 1.66 pounds per hour and 7.25 tons per year.</p> <p>Total carbon monoxide emissions from the regenerative thermal oxidizer, for all equipment vented to the regenerative thermal oxidizer, shall not exceed 7.56 pounds per hour and 33.11 tons per year.</p>
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and sections A.I.2.b through A.I.2.e below and Attachments 1, 2, and 3 of PTI 07-00500.
40 CFR Part 60, Subpart VV	See Part II, section A.I.
40 CFR Part 60, Subpart Kb	See section A.I.2.f below.
40 CFR Part 63, Subpart A	See section A.I.2.g below.
OAC rule 3745-18-06(E)	See section A.I.2.h below.

2. Additional Terms and Conditions

- 2.a** BAT determination: Condensers; Regenerative thermal oxidizer (RTO); Submerged fill for fixed roof process tanks shall be installed below the liquid level
- 2.b** The permittee shall achieve the Required Mass Removal (RMR) as specified in 40 CFR 63.138(f) [see Attachment 2 of PTI 07-00500] for Group 1 wastewater streams.
- 2.c** For each wastewater tank that receives, manages, or treats a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream, the permittee shall comply with the requirements of either 40 CFR 63.133(a)(1) or (a)(2) [see Attachment 2 of PTI 07-00500] as specified in 40 CFR 63.133(a).
- i. In accordance with the permittee's permit application and 40 CFR 63.133(a)(1) [see Attachment 2 of PTI 07-00500], the following wastewater tanks shall be equipped with a fixed roof:

wastewater collection tank (401-F)

MHP feed surge tank (2470-F)
wastewater holding tank (2426-F)
wastewater holding tank (2427-F)
neutralization sump (2427-A)
wastewater holding tank (2428-F)

- ii. In accordance with the permittee's permit application and 40 CFR 63.133(a)(2) [see Attachment 2 of PTI 07-00500], the following wastewater tanks shall be equipped with a fixed roof and a closed vent system which routes the hazardous air pollutant vapors vented from the tank to a control device:

methyl hydroperoxide destruction reactor (2472-D) vented to a process heater (305-LA).

- 2.d** At the time of permit issuance, the permittee does not use surface impoundments, containers or oil-water separators to receive, manage, or treat Group 1 wastewater. If at any time the permittee uses a surface impoundment, container or an oil-water separator to receive, manage, or treat a Group 1 wastewater, the permittee shall comply with the requirements for surface impoundments, containers and oil-water separators as specified in 40 CFR 63.134, 40 CFR 63.135 and 40 CFR 63.137 [see Attachment 2 of PTI 07-00500], except as provided in 40 CFR 63.132(a)(2) and 40 CFR 63.138(a) [see Attachment 2 of PTI 07-00500].
- 2.e** The permittee shall comply with the applicable requirements for individual drain systems as specified in 40 CFR 63.136 [see Attachment 2 of PTI 07-00500], except as provided in 40 CFR 63.132(a)(2) and 40 CFR 63.138(a) [see Attachment 2 of PTI 07-00500].
- 2.f** The wastewater tanks are subject to the provisions of 40 CFR 60, Subpart Kb but are required to comply only with the requirements of 40 CFR Part 63, Subparts F, G, and H [see Attachments 1, 2, and 3 of PTI 07-00500].
- 2.g** Refer to Part II - Specific Facility Terms and Conditions of this permit, section A.II, for the requirements of 40 CFR Part 63, Subpart A; - National Emission Standards for Hazardous Air Pollutants - General Provisions.
- 2.h** The regenerative thermal oxidizer is fueled with natural gas and process vent gas only and has no process weight as defined in OAC rule 3745-18-01(B)(13).

Therefore, this equipment is exempt from the emissions limitations established in OAC rule 3745-18-06(E).

II. Operational Restrictions

1. In accordance with the permittee's permit application, the permittee is operating by treating the Group 1 wastewater streams in the enhanced biological treatment system (2600-D). The permittee has elected to monitor the chemical oxygen demand (COD) of the biological treatment system to fulfill the requirements of 40 CFR 63.143(c) [see Attachment 2 of PTI 07-00500]. The COD of the biological treatment system shall not exceed 200 ppm as a daily average.
2. In accordance with the permittee's permit application, the permittee is operating by routing the hazardous organic air pollutant vapors from the methyl hydroperoxide destruction reactor (2472-D) to the regenerative thermal oxidizer.

The minimum firebox temperature of the process heater (305-LA) shall be established during the emissions testing required in section A.V.2.

The regenerative thermal oxidizer (RTO) shall meet the conditions specified below and in 40 CFR 63.139(c)(1) [see Attachment 2 of PTI 07-00500].

- a. reduce the total organic compound emissions, less methane and ethane, or total organic HAPs emissions vented to the control device by 95 percent, by weight, or greater; or
- b. achieve an outlet total organic compound concentration, less methane and ethane, or total organic HAPs concentration of 20 ppmv on a dry basis corrected to 3% oxygen; or
- c. provide a minimum residence time of 0.5 second at a minimum temperature of 760 degrees Celsius.

III. Monitoring and/or Record Keeping Requirements

1. On a daily basis the permittee shall collect a sample from side A and a sample from side B of the biological treatment unit (2600-D). Each sample shall be analyzed for the COD in accordance with the reactor digestion method of Hach Method 8000 (Hach Handbook of Water Analysis, 1979, Hach Chemical Company, P.O. Box 389, Loveland, CO 80537). The permittee shall maintain daily records of the COD value for side A and for side B of the biological treatment unit (2600-D).
2. The permittee shall maintain a temperature monitoring device, equipped with a continuous recorder, in the firebox of the process heater (305-LA) in accordance with the requirements of 40 CFR 63.143(e)(4) [see Attachment 2 of PTI 07-00500].

The permittee shall maintain records of the regenerative thermal oxidizer (RTO) firebox temperature in accordance with 40 CFR 63.147(d) [see Attachment 2 of PTI 07-00500].

3. The permittee shall perform semiannual visual inspections of the wastewater tanks that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream, in accordance with 40 CFR 63.143(a) [see Attachment 2 of PTI 07-00500].

Records of the wastewater tank inspections shall be maintained in accordance with 40 CFR 63.147 [see Attachment 2 of PTI 07-00500].

4. For individual drain systems used to receive, manage, or treat Group 1 wastewater, the permittee shall comply with the monitoring requirements of 40 CFR 63.143(a) [see Attachment 2 of PTI 07-00500].

The permittee shall maintain records of the individual drain system inspections in accordance with 40 CFR 63.147 [see Attachment 2 of PTI 07-00500].

5. The permittee shall monitor any bypass line(s) that could divert a vent stream from the methyl hydroperoxide destruction reactor (2472-D) away from the regenerative thermal oxidizer in accordance with 40 CFR Part 63, Subpart G, Table 13 [see Attachment 2 of PTI 07-00500].
 - a. Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in 40 CFR Part 63, Subpart G, Table 13 [see Attachment 2 of PTI 07-00500]. 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
 - b. Secure the bypass line valve in the non-diverting 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 to ensure that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line.

The permittee shall maintain records of the flow indicator or monthly visual inspection requirements for bypass lines that could divert a vent stream from the methyl hydroperoxide destruction reactor (2472-D) away from the regenerative thermal oxidizer in accordance with 40 CFR 63.147 [see Attachment 2 of PTI 07-00500].

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6. The permittee shall maintain procedures for the management of maintenance wastewater in accordance with 40 CFR 63.105(a) [see Attachment 1 of PTI 07-00500].
7. The permittee shall maintain records for benzene waste operations in accordance with the requirements specified in 40 CFR 61.356 [see Part II, section IV].

IV. Reporting Requirements

1. The permittee shall submit periodic reports in accordance with 40 CFR 63.152(c) [see Attachment 2 of PTI 07-00500]. The periodic reports shall be submitted semiannually no later than 60 calendar days after the end of each 6-month period. The reports shall include all information specified in 40 CFR 63.117 and 40 CFR 63.118 [see Attachment 2 of PTI 07-00500] for process vents and all information specified in 40 CFR 63.146 [see Attachment 2 of PTI 07-00500] for process wastewater, including reports of periods when monitored parameters are outside their established ranges.
2. The permittee shall submit reports of start-up, shutdown, and malfunction in accordance with 40 CFR 63.10(d)(5) [see Part II, section A.II] and 40 CFR 63.152(d)(1) [see Attachment 2 of PTI 07-00500]. The semiannual start-up, shutdown and malfunction reports may be submitted on the same schedule as the periodic reports required under 40 CFR 63.152(c) [see Attachment 2 of PTI 07-00500] instead of the schedule specified in 40 CFR 63.10(d)(5) [see Part II, section A.III].
3. The permittee shall submit reports for benzene waste operations in accordance with the requirements specified in 40 CFR 61.357 [see Part II, section A.IV].
4. Reports required by 40 CFR Part 63, Subparts F, G, and H [see Attachments 1, 2, and 3 of PTI 07-00500] shall be submitted to USEPA Region 5, with a copy to the Portsmouth Local Air Agency, in accordance with 40 CFR 63.103(d) & (d)(1) [see Attachment 1 of PTI 07-00500].

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:

Volatile organic compound emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 192.47 pounds per day.

Volatile organic compound emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 35.13 tons per year.

Acetone emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 23.72 pounds per day.

Acetone emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 4.33 tons per year.

Ammonia emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 185.32 pounds per day.

Ammonia emissions from all equipment except the regenerative thermal oxidizer and fugitive equipment leaks shall not exceed 33.82 tons per year.

Applicable Compliance Method:

The volatile organic compound emissions (the potential to emit) from the equipment listed in the following table shall be summed. The acetone emissions (the potential to emit) from the equipment listed in the following table shall be summed. The ammonia emissions (the potential to emit) from the equipment listed in the following table shall be summed.

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A or EPA CTM-027, as appropriate.

Equipment ID	Equipment Description	Egress Point	Control Device	VOC (lb/day)	VOC (tpy)	Acetone (lb/day)	Acetone (tpy)	NH3 (lb/day)	NH3 (tpy)	Notes
2421-A	Oily waste sump	WP01	None	0.19	0	0.2	0.04	0	0	2
2426-F	Wastewater holding tank	WP02	None	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	2
2427-F	Wastewater holding tank	WP03	None	45.28	8.26	9.66	1.76	0	0	2
2428-F	Wastewater holding tank	WP04	None	24.16	4.41	7.39	1.35	0	0	2
2402-L	Coalescer	WP05	None	0.04	0	0.01	<0.01	0	0	2
2421-F	Waste oil decanter tank	WP05	None	0.16	0	0.03	0.01	0	0	2
2427-A	Neutralization sump	WP06	None	23	4.2	4.9	0.89	0	0	2
2428-A	Wastewater sump	WP11	None	0.13	0	<0.01	<0.01	0	0	2

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2489-F	Waste oil decanter tank	WP13	None	0.38	0.1	0.31	0.06	0	0	2
2490-F	Wastewater tank	WP13	None	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	2
2600-D	Biological treatment unit	WP14	None	82.86	15.1	1.21	0.22	0.44	0.08	2
401-F	Process wastewater collection tank	WP15	None	3.6	0.66	0	0	0	0	2
2470-F	MHP feed surge tank	WP16	2473-C Condenser			0	0	0	0	1
2439-F	Storm water tank	WP50	None	2.27	0.41	0	0	18.55	3.39	2
2440-F	Storm water tank	WP51	None	0.7	0.13	0	0	69.86	12.75	2
2441-F	Storm water tank	WP52	None	3.45	0.63	0	0	96.44	17.6	2
2242-F	Storm water tank	WP53	None	3.81	0.7	0	0	0	0	2
2201-A	Storm water diversion sump	WP54	None	2.44	0.45	0	0	0	0	2

1. VOC, acetone, and ammonia emissions (lb/day and tpy) from this equipment are controlled. The VOC, acetone, and ammonia emissions include the emissions reductions due to the control device. These values represent the controlled potentials to emit and are identified in previous application submittals (PTI 07-00451). Individual equipment VOC, acetone, and ammonia (lb/day and tpy) values are not independently enforceable in this permit.

2. VOC, acetone, and ammonia emissions (lb/day and tpy) from this equipment are uncontrolled. These values represent the potentials to emit and are identified in previous application submittals (PTI 07-00451). Individual equipment VOC, acetone, and ammonia (lb/day and tpy) values are not independently enforceable in this permit.

1.b Emission Limitation:

Total particulate emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 0.68 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures and methods required in OAC rule 3745-17-03(B)(9).

1.c Emission Limitation:

Total particulate emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 3.0 tons per year.

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Compliance with the tons per year emission limitation shall be assumed provided compliance with the hourly emission limitation is maintained.

1.d Emission Limitation:

Total nitrogen oxides emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 1.66 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 or 7E.

1.e Emission Limitation:

Total nitrogen oxides emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 7.25 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Compliance with the tons per year emission limitation shall be assumed provided compliance with the hourly emission limitation is maintained.

1.f Emission Limitation:

Total carbon monoxide emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 7.56 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

1.g Emission Limitation:

Total carbon monoxide emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 33.11 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Compliance with the tons per year emission limitation shall be assumed provided compliance with the hourly emission limitation is maintained.

1.h Emission Limitation:

Total volatile organic compound (including acetone) emissions from the regenerative

thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 6.17 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, or 25A, as appropriate.

1.i Emission Limitation:

Total volatile organic compound (including acetone) emissions from the regenerative thermal oxidizer, of all equipment vented to the regenerative thermal oxidizer, shall not exceed 27.02 tons per year, as a 12-month rolling summation of VOC emissions.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual hours of operation per month and the conversion factor of ton/2000 lbs, to arrive at the tons per month emissions. The monthly emissions shall be added to the previous 11 months emissions to determine the rolling 12-month total emissions.

1.j Emission Limitation:

The permittee shall achieve the Required Mass Removal (RMR) of Table 9 compounds for Group 1 wastewater streams.

Applicable Compliance Method:

If required, the permittee shall demonstrate that the actual mass removal (AMR) is greater than or equal to the RMR. The RMR and AMR shall be calculated in accordance with the equations and procedures in 40 CFR 63.145(f) [see Attachment 2 of PTI 07-00500].

1.h Emission Limitation:

Reduce the total organic compound emissions, less methane and ethane, or total organic HAPs emissions vented from the methyl hydroperoxide destruction reactor (2472-D) to the regenerative thermal oxidizer by 95 percent, by weight, or greater; or

Achieve total organic compound concentration, less methane and ethane, or total organic HAPs concentration of 20 ppmv on a dry basis corrected to 3% oxygen at the

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outlet of the regenerative thermal oxidizer.

Applicable Compliance Method:

In accordance with 40 CFR 63.145(i) [see Attachment 2 of PTI 07-00500], the concentration (ppm) and/or control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the regenerative thermal oxidizer shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Method 1 through 4, and 18, 25, or 25A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - P012 - Phenol III Process Unit with the following air pollution control devices: condenser (4251-C), condenser (4711-C), condenser (4712-C), scrubber (4710-E), catalytic oxidizer (4230-L); administrative modification to place terms into new PTI format and to update with most recent Title V permit terms and conditions

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound emissions from the catalytic oxidizer (4230-L) shall not exceed 69.26 pounds per day and 12.64 tons per year.</p> <p>Acetone emissions from the catalytic oxidizer (4230-L) shall not exceed 4.93 pounds per day and 0.90 ton per year.</p> <p>Nitrogen oxides emissions from the catalytic oxidizer (4230-L) shall not exceed 41.32 pounds per day and 7.54 tons per year.</p> <p>Acetone emissions from the acetone rundown tanks (4312-FA and 4312-FB) shall not exceed 4.32 tons per year.</p> <p>Negligible emissions of particulate, particulate less than ten microns and sulfur dioxide from the catalytic oxidizer (4230-L).</p> <p>See section A.I.2.a below.</p>
40 CFR Part 52.21 and OAC rules 3745-31-10 thru 20 (BACT Limit)	Volatile organic compound emissions shall be reduced by 99%.

40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.III and sections A.I.2.b and A.I.2.c below.
40 CFR Part 60, Subpart NNN	See section A.I.2.d below.
40 CFR Part 60, Subpart III	See section A.I.2.e below.
40 CFR Part 60, Subpart Kb	See section A.I.2.f below.
40 CFR Part 60, Subpart VV	See Part II, section A.I.
OAC rule 3745-21-09(DD)	See Part II, section A.I.
OAC rule 3745-21-09(EE)	See sections A.I.2.g and A.I.2.h below.
OAC rule 3745-18-06	See section A.I.2.i below.

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
- 2.b** In accordance with 40 CFR 63.113(a)(2), (a)(2)(i), and (a)(2)(ii) [see Attachment 2 of PTI 07-00500], for all Group 1 process vent streams, the emissions of total organic HAPs shall be reduced by 98 weight-percent or to a concentration of 20 parts per million by volume, whichever is less stringent. The emission reduction or concentration shall be calculated on a dry basis, corrected to 3% oxygen.
- 2.c** For each wastewater tank that receives, manages, or treats a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream, the permittee shall comply with the requirements of either 40 CFR 63.133(a)(1) or (a)(2) [see Attachment 2 of PTI 07-00500] as specified in 40 CFR 63.133(a) [see Attachment 2 of PTI 07-00500].
- i. In accordance with the permittees's permit application and 40 CFR 63.133(a)(1) [see Attachment 2 of PTI 07-00500], the following wastewater tank shall be equipped with a fixed roof:

Dephenolization Purge Drum (4630-F).

- ii. In accordance with the permittees's permit application and 40 CFR 63.133(a)(2) [see Attachment 2 of PTI 07-00500], the following wastewater tank shall be equipped with a fixed roof and a closed vent system which routes the hazardous air pollutant vapors vented from the tank to a control device:

MHP Decomposer (4272-D) vented to a catalytic oxidizer (4230-L).

- 2.d** The following distillation units and associated recovery equipment are subject to the provisions of 40 CFR Part 60, Subpart NNN but are required to comply only with 40 CFR Part 63, Subparts F and G [see Attachments 1 and 2 of PTI 07-00500] as process vents with the designated group determinations, per 40 CFR 63.110(d)(10) :

<u>Egress Point</u>	<u>Distillation Column</u>	<u>Equipment Number</u>	<u>Group</u>
P301	Primary Cumene Stripper	(4202-E)	1
P301	Secondary Cumene Stripper	(4203-E)	1
P301	Acetone Product Column System	(4301-E) (4610-E) (4302-E)	2
P301	Crude Phenol Column	(4304-E)	2
P301	Hydrocarbon Removal Column	(4305-E)	2
P301	Phenol Finishing Column	(4307-E)	2

- 2.e** The following equipment is subject to the provisions of 40 CFR Part 60, Subpart III but are required to comply only with the terms and conditions of 40 CFR Part 63, Subparts F, G, and H:

Air oxidation reactor train and its combined vent stream 4201-DA, 4201-DB, 4201-DC and Oxidation Process Surge Drum (4208-F).

- 2.f** The Group 2 storage vessels within this process unit are subject to the provisions of 40 CFR Part 60, Subpart Kb but are required to comply only with

40 CFR Part 63, Subparts F, G, and H.

- 2.g** [OAC rule 3745-21-09(EE)(1)]
Except where exempted under OAC rule 3745-21-09(EE)(2), the permittee shall vent process vent streams from air oxidation processes, producing a chemical listed in Appendix A of OAC rule 3745-21-09, to a combustion device which:
- i. reduces the VOC emissions vented to it with an efficiency of at least 98 percent, by weight; or
 - ii. emits a VOC concentration less than 20 ppm by volume, dry basis.
- 2.h** [OAC rule 3745-21-09(EE)(2)(b)]
Any process vent stream or combination of process vent streams which maintain a TRE of value greater than 1.0 shall be exempt from the requirements of OAC rule 3745-21-09(EE)(1). If an air oxidation process has more than one process vent stream, the TRE shall be based upon a combination of the process vent streams. The TRE shall be calculated in accordance with OAC rule 3745-21-09(EE)(3).
- 2.i** The catalytic oxidizer (4230-L) is fueled with natural gas and process vent gas only and has no process weight as defined in OAC rule 3745-18-01(B)(13). Therefore, this equipment is exempt from the emissions limitation established in OAC rule 3745-18-06(E).
- 2.j** There are no uncontrolled particulate emissions from the Phenol III process unit; therefore, OAC rules 3745-17-07(A) and 3745-17-11 are not applicable to the Phenol III process unit.

II. Operational Restrictions

1. In accordance with the permittee's permit application, the permittee is operating by routing the organic vapors from Group 1 process vents from the Phenol III process unit to a catalytic oxidizer (4230-L) in order to comply with the percent reduction requirement or concentration limit specified in 40 CFR 63.113(a)(2), (a)(2)(i), and (a)(2)(ii) [see Part II, section A.III].

In accordance with the permittee's permit application, the permittee is operating by routing the hazardous organic air pollutant vapors from the MHP Decomposer (4272-D) to the catalytic oxidizer (4230-L) in order to comply with the percent reduction requirement, concentration limit, or residence time requirement specified in 40 CFR 63.139(c)(1) [see Part II, section A.III].

The minimum temperature of gases at the inlet of the catalyst bed shall be 752 degrees

Fahrenheit (400 degrees Celsius) calculated on a daily average.

The minimum temperature difference of the gases across the catalyst bed shall be 49 degrees Fahrenheit (9.44 degrees Celsius) calculated on a daily average.

2. The permittee shall burn only process vent gases and/or natural gas in the catalytic oxidizer (4230-L).
3. The Phenol III Hub and the CHP Hub shall be equipped with tightly fitting solid covers in accordance with 40 CFR 63.149 [see Part II, section A.III].
4. The crude AMS surge tank (4505-F) is a surge control vessel with a capacity of 868.8 cubic meters, containing material with a maximum true organic HAP vapor pressure of 0.225 psia at operating temperature, and the organic vapors vented from the vessel are not vented back to the process. Therefore, the surge control vessel shall be vented to a control device that complies with the requirements in 40 CFR 63.172 [see Part II, section A.III].

In accordance with the permittee's permit application, the permittee is operating by routing the organic vapors from the surge control vessel (4505-F) to the catalytic oxidizer (4230-L). Whenever organic HAP emissions are vented to a closed-vent system or control device used to comply with 40 CFR Part 63, Subpart H [see Part II, section A.III], such system or control device shall be operating.

The catalytic oxidizer (4230-L) shall be designed and operated to reduce the organic HAP emissions or volatile organic compound emissions vented to it with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume on a dry basis corrected to 3 percent oxygen, whichever is less stringent, or to provide a minimum residence time of 0.50 second at a minimum temperature of 760 degrees Celsius.

5. Each surge control vessel or bottoms receiver tank which meets one of the conditions listed in 40 CFR 63.170 [see Part II, section A.III] shall be equipped with a closed vent system that routes the organic vapors from the surge control vessel or bottoms receiver tank back to the process or to a control device that complies with the requirements of 40 CFR 63.172 [see Part II, section A.III] or shall be equipped with a fixed roof and an internal floating roof or an external floating roof.

In accordance with the permittee's permit application, the following surge control vessels and bottoms receiver tanks do not exceed the threshold triggers of 40 CFR

Emissions Unit ID: **P012**

63.170 [see Part II, section A.III]. Therefore, these vessels are not required to meet the conditions listed in 40 CFR 63.170 [see Part II, section A.III] at the time of permit issuance: 4202-F, 4213-F, 4214-F, 4301-F, 4330-F, 4337-F, 4338-F, 4339-F, 4342-F, 4373-F, 4620-F, 4640-F, 4640-F, and 4721-F.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform semiannual visual inspections of the wastewater tanks that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream in accordance with 40 CFR 63.143(a) [see Part II, section A.III]. Records of the wastewater tank inspections shall be maintained in accordance with 40 CFR 63.147 [see Part II, section A.III].
2. The permittee shall monitor the closed vent system which routes the organic vapors from the crude AMS surge control vessel (4505-F) to the catalytic oxidizer (4230-L) in accordance with 40 CFR 63.172(f), 40 CFR 63.172(h), (h)(1), & (h)(2), 40 CFR 63.172(i), 40 CFR 63.172(j), 40 CFR 63.172(k), and 40 CFR 63.172(l), (l)(1), & (l)(2) [see Part II, section A.III].

The permittee shall monitor the catalytic oxidizer (4230-L) to ensure that it is operated and maintained in conformance with its design as required by 40 CFR 63.172(e) [see Part II, section A.III].

3. The permittee shall maintain temperature monitoring devices, equipped with continuous recorders, immediately before and after the catalyst bed of the catalytic oxidizer (4230-L) in accordance with the requirements of 40 CFR 63.114(a) and 40 CFR 63.143(e) [see Part II, section A.III].

The permittee shall maintain records of the temperature immediately prior to the catalyst bed, immediately after the catalyst bed, and the temperature difference across the catalyst bed in accordance with 40 CFR 63.118(a) [see Part II, section A.III].

4. The permittee shall monitor any bypass line(s) that could divert a Group 1 process vent or vent stream away from the MHP Destructor (4272-D) away from the catalytic oxidizer (4230-L) in accordance with 40 CFR 63.114(d) and 40 CFR 63.143(e) [see Part II, section A.III]. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to 40 CFR 63.114(d) [see Part II, section A.III].
 - a. Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in 40 CFR 63.118(a)(3) and 40 CFR Part 63, Subpart G, Table 13 [see Attachment 2 of PTI 07-00500]. 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

- b. Secure the bypass line valve in the non-diverting 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 to ensure that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line.

The permittee shall maintain records of the flow indicator or monthly visual inspection requirements for bypass lines that could divert a Group 1 process vent or vent stream from the MHP Destructor (4272-D) away from the catalytic oxidizer (4230-L) in accordance with 40 CFR 63.118(a)(3), 40 CFR 63.118(a)(4) and 40 CFR 63.147 [see Part II, section A.III].

5. Whenever process changes are made that could reasonably be expected to change a Group 2 process vent to a Group 1 process vent, the permittee shall recalculate the TRE index value, flow, or organic HAP concentration, as necessary, to determine if the vent is Group 1 or Group 2 in accordance with 40 CFR 63.115(e) [see Part II, section A.III].

The permittee shall maintain records of process vent group determinations in accordance with 40 CFR 63.117, 40 CFR 63.118(c), 40 CFR 63.118(d), and 40 CFR 63.118(e) [see Part II, section A.III].

6. For each Group 2 storage vessel, the permittee shall comply with the record keeping requirements of 40 CFR 63.123(a) [see Part II, section A.III].
7. For each Group 1 process wastewater stream, the permittee shall comply with the requirements of 40 CFR 63.132 through 40 CFR 63.149 [see Part II, section A.III].
8. For each Group 2 process wastewater stream, the permittee shall comply with the record keeping requirements of 40 CFR 63.147 [see Part II, section A.III].
9. The permittee shall monitor the cooling water at the inlet and outlet of the Phenol III heat exchange system for the presence of cumene and phenol in accordance with 40 CFR 63.104(b), 40 CFR 63.104(d), and 40 CFR 63.104(e) [see Part II, section A.II]. On a quarterly basis, the permittee shall obtain three samples from the inlet and three samples from the outlet of the heat exchanger. The permittee shall analyze the samples in accordance with the methods and procedures of Method 624 and 625 of 40 CFR Part 136, Appendix A. The results of the analysis shall be evaluated as specified in 40 CFR 63.104(b)(6) [see Part II, section A.II].

The permittee shall maintain heat exchange system records in accordance with 40 CFR 63.104(f)(1) [see Part II, section A.II].

10. The permittee shall maintain procedures for the management of maintenance wastewater in accordance with 40 CFR 63.105(a) [see Part II, section A.II].
11. For each day during which the permittee burns a fuel other than process vent gases and/or natural gas in the catalytic oxidizer (4230-L), the permittee shall maintain a record of the type and quantity of fuel burned.
12. [OAC rule 3745-21-09(EE)(3)(a)]
 The total resource effectiveness value for an air oxidation process shall be calculated in accordance with the following equations:

- i. For nonchlorinated process vent streams with a net heating value less than or equal to 3.6 and for all chlorinated process vent streams:

$$TRE = [a + bW^{.88} + cW + dWH + eW^{.88} H^{.88} + f W^5] / E$$

where:

TRE = total resource effectiveness value;

E = maximum hourly VOC emission rate at the vent stream design flowrate (W), in kilograms of VOC per hour (kg/hr);

W = vent stream design flowrate at a standard temperature of 20 degrees Celsius, in standard cubic meters per minute (scm/min);

H = vent stream net heating value, as determined in accordance with OAC rule 3745-21-10(P)(2), in megajoules per standard cubic meter (10^6 J/scm); and

a, b, c, d, e, and f = applicable coefficients from Appendix B of OAC rule 3745-21-09.

- ii. For nonchlorinated process vent streams with a net heating value greater than 3.6:

$$TRE = [a + bW^{.88} + cW + dWH + eW^{.88} H^{.88} + f(WH / 3.6)^5] / E$$

where TRE, E, W, H, a, b, c, d, e, and f are defined as above.

13. [OAC rule 3745-21-09(EE)(3)(b)]
 The parameters used in the total resource effectiveness equations shall be measured

at the outlet(s) of the final product recovery device(s) where VOC is reclaimed for beneficial reuse (recycle, sale or use in another part of the process).

14. The permittee shall maintain records for benzene waste operations in accordance with the requirements specified in 40 CFR 61.356 [see Part II, section A.IV].

IV. Reporting Requirements

1. The permittee shall submit periodic reports in accordance with 40 CFR 63.152(c) [see Part II, section A.III]. The periodic reports shall be submitted semiannually no later than 60 calendar days after the end of each 6-month period. The reports shall include all information specified in 40 CFR 63.117 and 40 CFR 63.118 [see Part II, section A.III] for process vents and all information specified in 40 CFR 63.146 [see Part II, section A.III] for process wastewater, including reports of periods when monitored parameters are outside their established ranges.
2. The permittee shall submit reports of start-up, shutdown, and malfunction in accordance with 40 CFR 63.10(d)(5) [see Part II, section A.II] and 40 CFR 63.152(d)(1) [see Part II, section A.III]. The semiannual start-up, shutdown, and malfunction reports may be submitted on the same schedule as the periodic reports required under 40 CFR 63.181(c) [see Part II, section A.III] instead of the schedule specified in 40 CFR 63.10(d)(5) [see Part II, section A.II].
3. Whenever the recalculations (performed whenever process changes are made that could reasonably be expected to change a Group 2 process vent to a Group 1 process vent) determine one of the criteria below have been met, the permittee shall submit a report as specified in 40 CFR 63.118(g), (h), (i), and (j) [see Part II, section A.III] and the permittee shall comply with the appropriate provisions in 40 CFR 63.113 [see Part II, section A.III] by the dates specified in 40 CFR Part 63, Subpart F [see Part II, section A.III].
 - a. the recalculated TRE index value is less than or equal to 1.0;
 - b. the recalculated TRE index value is less than or equal to 4.0 but greater than 1.0;
 - c. the recalculated flow rate is greater than or equal to 0.005 standard cubic meter per minute; or
 - d. the recalculated concentration is greater than or equal to 50 parts per million by volume.
4. For each heat exchange system, the permittee shall comply with the reporting

Emissions Unit ID: P012

requirements of 40 CFR 63.104(f)(2) [see Part II, section A.III].

5. The permittee shall submit reports of any fuels burned in the catalytic oxidizer (4230-L) other than process vent gases and/or natural gas within thirty (30) days to the Portsmouth local air agency, including the date, type, and amount of any such fuel burned.
6. The permittee shall submit reports for benzene waste operations in accordance with the requirements specified in 40 CFR 61.357 [see Part II, section A.IV].
7. Reports required by 40 CFR Part 63, Subparts F, G, and H [see Part II, section A.III] shall be submitted to USEPA Region 5, with a copy to the Portsmouth local air agency, in accordance with 40 CFR 63.103(d) and (d)(1) [see Part II, section A.III].

V. Testing Requirements

1. Compliance with the 99% weight-percent reduction for the catalytic incinerator shall be determined by measuring either organic HAP or TOC as specified in 40 CFR 63.116.
2. Within 180 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 emissions unit 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 Portsmouth Local Air 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
P012	NO _x , VOC, HAP (or TOC)

5. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: P012

5.a Emission Limitation:

Volatile organic compound emissions from the catalytic oxidizer (4230-L) shall not exceed 69.26 pounds per day.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, or 25A.

5.b Emission Limitation:

Volatile organic compound emissions from the catalytic oxidizer (4230-L) shall not exceed 12.64 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable daily emission limitation by 365 days per year, and then dividing by 2,000 pounds per ton. Compliance with the tons per year emission limitation shall be assumed provided compliance with the daily emission limitation is maintained.

5.c Emission Limitation:

Acetone emissions from the catalytic oxidizer (4230-L) shall not exceed 4.93 pounds per day.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18.

5.d Emission Limitation:

Acetone emissions from the catalytic oxidizer (4230-L) shall not exceed 0.90 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable daily emission limitation by 365 days per year, and then dividing by 2,000 pounds per ton. Compliance with the ton per year emission limitation shall be assumed provided compliance with the daily emission limitation is maintained.

5.e Emission Limitation:

Nitrogen oxides emissions from the catalytic oxidizer (4230-L) shall not exceed 41.32 pounds per day.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 7 or 7e.

5.f Emission Limitation:

Nitrogen oxides emissions from the catalytic oxidizer (4230-L) shall not exceed 7.54 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable daily emission limitation by 365 days per year, and then dividing by 2,000 pounds per ton. Compliance with the tons per year emission limitation shall be assumed provided compliance with the daily emission limitation is maintained.

5.g Emission Limitation:

Negligible emissions of particulate, particulate less than ten microns and sulfur dioxide from the catalytic oxidizer (4230-L).

Applicable Compliance Method:

The emission rates of particulates, particulates less than ten microns, and sulfur dioxide are negligible as long as only natural gas is burned as fuel in the catalytic oxidizer (4230-L).

5.h Emission Limitation:

Acetone emissions from the acetone rundown tanks (4312-FA and 4312-FB) shall be less than 4.32 tons per year.

Applicable Compliance Method:

The acetone emissions (the potential to emit) from the equipment as listed below shall be summed.

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18.

Equipment ID	Equipment Description	Egress Point	Control Device	Acetone (lb/day)	Acetone (tpy)	Notes
4312-FA	Acetone rundown tank	P302	Internal floating roof	11.82	2.16	1
4312-FB	Acetone rundown tank	P303	Internal floating roof	11.82	2.16	1

- Acetone emissions (lb/day and tpy) from this equipment are controlled. The acetone emissions include the emissions reductions due to the control device. These values represent the controlled potentials to emit and are identified in previous application submittals (PTI 07-00451). Individual equipment acetone (lb/day and tpy) values are not independently enforceable in this permit.

5.i Emission Limitation:

Volatile organic compound emissions from all equipment vented to the catalytic oxidizer (4230-L) shall be reduced by 99%.

Applicable Compliance Method:

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the catalytic oxidizer (4230-L)) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, or 25A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

5.j Emission Limitation:

The emissions of total organic HAP from Group 1 process vents shall be reduced by 98 weight-percent or to a concentration of 20 parts per million by volume, whichever is less stringent. The emission reduction or concentration shall be calculated on a dry basis, corrected to 3% oxygen.

Applicable Compliance Method:

Emissions Unit ID: **P012**

If required, the concentration (ppm) and/or control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the catalytic oxidizer (4230-L)) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, or 25A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

5.k Emission Limitation:

The emissions of total organic compounds, less methane and ethane, or total organic HAPs from the MHP Decomposer (4272-D) shall be reduced by 95 weight-percent or to a concentration of 20 parts per million by volume on a dry basis corrected to 3 percent oxygen, whichever is less stringent.

Applicable Compliance Method:

If required, the concentration (ppm) and/or control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the catalytic oxidizer (4230-L)) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, or 25A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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 operation(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.

Operations, Property, and/or Equipment - P012 - Phenol III Process Unit with the following air pollution control devices: condenser (4251-C), condenser (4711-C), condenser (4712-C), scrubber (4710-E), catalytic oxidizer (4230-L)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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Sunoco Inc (RM)

PTI Application: 07 00151

Issue

Facility ID:

0773000080

Emissions Unit ID: P012

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 operation(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.

Operations, Property, and/or Equipment - J001 - Acetone, alphas-methylstyrene, and aniline barge loading

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compounds (VOC) emissions shall not exceed 0.45 tpy. Acetone emissions shall not exceed 104.48 tpy.

2. Additional Terms and Conditions

- 2.a BAT Determination: Submerged fill

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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Sunoco

PTI A

Issued: 2/25/2008

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 operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - J004 - railcar loading of phenol, acetone, and alphas-methylstyrene top load, splash fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound emissions shall not exceed 12.94 tons per year.</p> <p>Acetone emissions shall not exceed 303.0 tons per year.</p>
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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 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 record keeping 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

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

1.a Emission Limitation:

Volatile organic compound emissions shall not exceed 12.94 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the equations and procedures obtained from AP-42, Volume 1, 5th Edition, Chapter 5, Section 5.2, dated January, 1995 as summarized below. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

- i. phenol: multiply the annual throughput of the loading rack in gallons per year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of phenol, 0.0626 psia, times the molecular weight of phenol vapors, 94.11 pound per pound-mole, divided by the temperature of the phenol loaded, 590 degrees Rankin divided by 2,000 pounds per ton; and
- ii. alphas-methylstyrene (AMS): multiply the annual throughput of the loading rack in gallons/year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of AMS, 0.0138 psia, times the molecular weight of AMS vapors, 118.18 pound/pound-mole, divided by the temperature of the AMS loaded, 515 degrees Rankin divided by 2,000 pounds/ton.

1.b Emission Limitation:

Acetone emissions shall not exceed 303.0 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the equations and procedures obtained from AP-42, Volume 1, 5th Edition, Chapter 5, Section 5.2, dated January, 1995 as summarized below. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

- i. acetone: multiply the annual throughput of the loading rack in gallons per year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of acetone, 2.5512 psia, times the molecular weight of acetone vapors, 58.08 pound per pound-mole, divided by the temperature of the acetone loaded, 515 degrees Rankin divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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.

Operations, Property, and/or Equipment - J006 - truck loading of phenol, acetone, and alphas-methylstyrene top load, splash fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 12.94 tons per year. Acetone emissions shall not exceed 303.0 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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 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 record keeping 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

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

1.a Emission Limitation:

Volatile organic compound emissions shall not exceed 12.94 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the equations and procedures obtained from AP-42, Volume 1, 5th Edition, Chapter 5, Section 5.2,

dated January, 1995 as summarized below. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

- i. phenol: multiply the annual throughput of the loading rack in gallons per year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of phenol, 0.0626 psia, times the molecular weight of phenol vapors, 94.11 pound per pound-mole, divided by the temperature of the phenol loaded, 590 degrees Rankin divided by 2,000 pounds per ton; and
- ii. alphas-methylstyrene (AMS): multiply the annual throughput of the loading rack in gallons per year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of AMS, 0.0138 psia, times the molecular weight of AMS vapors, 118.18 pound per pound-mole, divided by the temperature of the AMS loaded, 515 degrees Rankin divided by 2,000 pounds per ton.

1.b Emission Limitation:

Acetone emissions shall not exceed 303.0 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the equations and procedures obtained from AP-42, Volume 1, 5th Edition, Chapter 5, Section 5.2, dated January, 1995 as summarized below. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

- i. acetone: multiply the annual throughput of the loading rack in gallons per year times the constant 0.01246 times the saturation factor of 1.45 times the true vapor pressure of acetone, 2.5512 psia, times the molecular weight of acetone vapors, 58.08 pound per pound-mole, divided by the temperature of the acetone loaded, 515 degrees Rankin divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

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Sunoco Inc (RM)

PTI Application: 07 00151

Issue

Facility ID:

0773000080

Emissions Unit ID: J006

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T023

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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.

Operations, Property, and/or Equipment - T023 - truck loading of phenol, acetone, and alphas-methylstyrene top load, splash fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 5.86 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping Requirements

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

Sunoco Inc (RM)
PTI Application: 07-00451
Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: **T023**

2. Miscellaneous HON record keeping 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

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:

Volatile organic compound emissions shall not exceed 5.86 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T023

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T024

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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.

Operations, Property, and/or Equipment - T024 - 1,504,000-gallon cumene storage tank (2101-FB) with a fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 5.86 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping Requirements

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

Sunoco Inc (RM)
PTI Application: 07-00451
Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T024

2. Miscellaneous HON record keeping 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

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:

Volatile organic compound emissions shall not exceed 5.86 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T024

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T025 -993,000-gallon phenol storage tank (2102-FA) with a fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 4.93 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

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Sunor

PTI A

Issued: 2/25/2008

Emissions Unit ID: **T025**

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

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:

Volatile organic compound emissions shall not exceed 4.93 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T025

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T025 -993,000-gallon phenol storage tank (2102-FB) with a fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 4.93 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

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Sunor

PTI A

Issued: 2/25/2008

Emissions Unit ID: **T026**

63.123.

Sunoco Inc (RM)
PTI Application: 07-00451
Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: **T026**

2. Miscellaneous HON recordkeeping requirements

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

IV. Reporting Requirements

None

V. Testing Requirements

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:

Volatile organic compound emissions shall not exceed 4.93 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T033

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 operation(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.

Operations, Property, and/or Equipment - T033 - 2,086,000-gallon cumene storage tank (2101-FC) with a fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 7.96 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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 record keeping 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

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:

Volatile organic compound emissions shall not exceed 7.96 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T034

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 operation(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.

Operations, Property, and/or Equipment - T034 - 977,600-gallon phenol storage tank (2102-FC) with a fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 5.06 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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 record keeping 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

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:

Volatile organic compounds shall not exceed 5.06 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth local air agency and may also require the PTI and this permit to be modified.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T035 - 249,671 gallon fixed roof storage tank for alphas-methylstyrene

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 0.21 ton per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

Sunoco Inc (RM)
PTI Application: 07-00451
Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T035

63.123.

Sunoco**PTI A****Issued: 2/25/2008**Emissions Unit ID: **T035****2. Miscellaneous HON record keeping 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 operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sunoco
 PTI A
 Issued: 2/25/2008

Emissions Unit ID: T039

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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.

Operations, Property, and/or Equipment - T039- 1,015,112-gallon fixed roof cumene or crude AMS storage tank (2003-FA) with submerged fill; This PTI supercedes PTI number 07-232 issued on 2/27/91.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 4.94 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.III.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

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permittee is not required to comply with any other provisions of 40 CFR 63.119 through 63.123.

2. Miscellaneous HON record keeping 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

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:

Volatile organic compound emissions shall not exceed 4.94 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T049 - 249,671 gallon fixed roof storage tank for alphas-methylstyrene

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 0.22 ton per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

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PTI A

Issued: 2/25/2008

Emissions Unit ID: **T049**

63.123.

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Emissions Unit ID: **T049**

2. Miscellaneous HON record keeping 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 operation(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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T059 - 11,844-gallon hydrogenation feed tank with submerged fill and the following air pollution control device: condenser (3511-C)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 1.11 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.II.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.
40 CFR Part 60, Subpart Kb	See section A.I.2.b below.

2. Additional Terms and Conditions

- 2.a BAT Determination: Vent condenser and submerged fill; Compliance with applicable requirements for HON Group2 storage vessels
- 2.b This group 2 storage vessel is subject to the provisions of 40 CFR Part 60, Subpart Kb but is required to comply only with 40 CFR Part 63, Subparts F, G, and H [see Attachments 1, 2, and 3 of PTI 07-00500].

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 record keeping 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

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:

Volatile organic compound emissions shall not exceed 1.11 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth local air agency and may also require the PTI and this permit to be modified.

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
PTI Application: 07-00451
Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T059

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 operation(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.

Operations, Property, and/or Equipment - T064 - 41,130-gallon hydrogenation AMS storage tank (326-F) with fixed roof and submerged fill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound emissions shall not exceed 6.55 tons per year.
40 CFR Part 63, Subpart A	See Part II, section A.III.
40 CFR Part 63, Subparts F, G, and H	See Part II, section A.I and section A.III.1 below and Attachments 1, 2, and 3 of PTI 07-00500.

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 Record Keeping 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

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Sunor

PTI A

Issued: 2/25/2008

Emissions Unit ID: **T064**

63.123.

2. Miscellaneous HON record keeping 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

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:

Volatile organic compound emissions shall not exceed 6.55 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using maximum throughput and the calculations and emission factors contained in AP-42, Volume I, 5th Edition, Chapter 1, Section 7.1, dated September, 1997. Alternate emission factors may be used with prior approval by the Portsmouth Local Air Agency and may also require this permit to be modified.

VI. Miscellaneous Requirements

None

Sunoco Inc (RM)
 PTI Application: 07-00451
 Issued: 2/25/2008

Facility ID: 0773000080

Emissions Unit ID: T064

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None