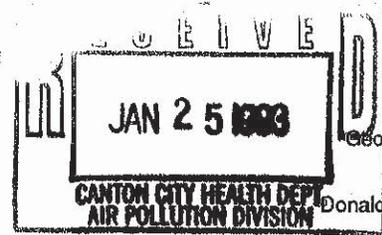




State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329



George V. Voinovich
Governor

Donald R. Schregardus
Director

January 21, 1993

CERTIFIED MAIL

Re: Conditional Permit to Operate
Application No. 1576000301 P016

Ashland Petroleum Company
P O Box 8170
Canton, OH 44711

Attention: Greg Moore

Dear Sir:

Enclosed is a Conditional Permit to Operate which will allow you to operate the described air contaminant source(s) only in a manner indicated in the permit. Please note that this permit will expire on May 8, 1993 and that it is not renewable. This permit contains other conditions and restrictions and I urge you to read them carefully.

A Conditional Permit to Operate is issued for the following source(s): P016.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code by any person who was a party to this proceeding. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, OH 43215.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

Enclosure

cc: US EPA
Canton Air Pollution Control

Issuance Date: January 21, 1993

Effective Date: January 21, 1993

Application No: 1576000301 P016

OHIO ENVIRONMENTAL PROTECTION AGENCY

CONDITIONAL PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

This document constitutes issuance to Ashland Petroleum Company of a conditional permit to operate a Sulfur Recovery Unit.

This conditional permit to operate authorizes the above-described air contaminant source to operate in accordance with OAC rule 3745-35-02(H). This conditional permit is issued subject to the applicant's affirmation that the applicant will use the conditional permit time period to test the source for compliance with applicable standards and/or remedy any defect which prevents compliance with OAC rule 3745-35-02(C)(4)(b).

Possession of this conditional permit to operate shall not relieve the above-described air contaminant source from the duty to comply with all applicable State and Federal air pollution laws and regulations.

The following terms and conditions are hereby expressly incorporated into this conditional permit to operate.

Condition 1

This conditional permit to operate shall be effective until May 8, 1993. This conditional permit shall be effective for a period not to exceed six (6) months from start-up of operation and is not renewable.

Condition 2

The Director of the Ohio Environmental Protection Agency, or his authorized representative, may enter upon the premises of the source operation at any reasonable time and subject to safety requirements of the person in control of the premises for the purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants and determining compliance with all applicable State and Federal air pollution laws and regulations and terms and conditions of this permit.

Condition 3 (This condition applicable if checked here:)

Upon declaration of an Air Pollution Alert, Warning or Emergency Episode, this air contaminant source will follow those emissions reduction procedures enumerated in the Emergency Action Plan approved by the Director for this source.

Condition 4

The Director must be notified in writing prior to any transfer of a conditional permit to operate. Such transfer shall not take place without written permission of the Director.

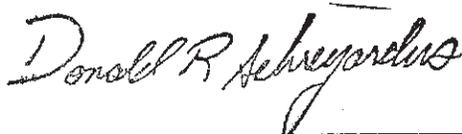
Condition 5

This conditional permit to operate shall be subject to revocation for any of the reasons specified in Rule 3745-35-02(F) of the Ohio Administrative Code.

Condition 6 (This condition applicable if checked here:)

This conditional permit to operate is subject to the supplementary conditions attached.

Ohio Environmental Protection Agency



Director

APPLICATION NUMBER: 15 76 0301 P016
FACILITY NAME: ASHLAND PETROLEUM COMPANY
EQUIPMENT DESCRIPTION: SULFUR RECOVERY UNIT
COMPANY ID: SULFUR RECOVERY UNIT (NEW)

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements of this source:

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

3745-31-05
3745-18-06

2. Allowable Mass Emission Limitation(s) and/or Control Requirements

The mass emissions from this source shall not exceed the following:

8.66 LBS SO₂/HR
250 PPM SO₂
37.9 TONS SO₂/YR
2.2 TONS OC/YR

3. PERFORMANCE TEST REQUIREMENTS

The permittee shall, within 60 days after achieving the maximum production rate at which the source will be operated, but not later than 180 days after the initial start-up of the source, conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the agency. If at the end of 90 days after start-up, P016 is not up to full capacity, ^[1] Ashland will document the compliance of P016 with the 250 ppm SO₂ emission limitation by the submittal of SO₂ Continuous Emissions Monitor (CEM) data. Ashland will conduct a performance test (stack test) at full capacity no later than 180 days after start-up. The initial performance test for P016 will be conducted when Source P011 is not contributing flow to the common stack and the entire refinery flow of H₂S gases is being routed through source P016 (not to exceed the capacity of source P016). Subsequent performance tests for P016 will be conducted as detailed in Additional Special Terms and

Conditions paragraph 11. Two copies of the written stack test report shall be submitted and signed by the person responsible for the test, describing the test procedures followed, and the results of such tests. 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.

Full capacity is defined as 90% or more of the sulfur production design capacity of Source P016, which is 52.2 long tons per day (LTD).

- 1) A completed Intent to Test form shall be submitted to the Division of Air Pollution Control, Canton City Health Department where the original permit application was filed. This notice shall be made 30 days in advance and shall specify operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- 2) Two copies of the stack test results shall be submitted within 30 days after the completion of the performance test.
- 3) Tests shall be performed for the following sources and pollutants:

Source	Pollutant(s)
P016	SO ₂ *

- * The determination of compliance of Source P016 with the emissions limitation shall be assessed at the common stack with Source P011.

4. MONITORING REQUIREMENTS

Source P016 shall be monitored by the SO₂ and O₂ monitors presently utilized by Source P011. The monitoring equipment has been installed and shall be maintained in accordance with the applicable portions of 40 CFR Part 60 -- Standards of Performance for New Stationary Sources, Appendix F.

Concurrent with the initial performance test of Source P016, this facility shall conduct a performance specification test of the continuous monitoring and recording equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 2 and 3. Personnel from the Ohio EPA Division of Air Pollution Control, Canton City Health Department, (CAPCD), shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the CAPCD office within 30 days as stated in OAC rule 3745-15-04(A).

Pursuant to 40 CFR parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the CAPCD office documenting all instances of sulfur dioxide values in excess of the limitations specified in 40 CFR Part 60, Subpart J. 60.104(a)(2)(i) or any limitations specified in the terms and conditions of this permit. These quarterly excess emissions reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters. This is consistent with 40 CFR 60.7(c) requirements to submit quarterly excess emissions reports required in accordance with Appendix F shall be submitted with the excess emission reports.

5. MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained in accordance with the preventive maintenance malfunction abatement plan submitted in accordance with Order no. 4 of the Findings & Orders issued to Ashland on 12/21/90.

6. ADDITIONAL SPECIAL TERMS AND CONDITIONS

For six months after the start-up of this second SRU, Ashland shall submit the following reports for the Sulfur Recovery Unit Complex on a monthly basis:

- a. Document all monitored sulfur dioxide values in excess of 250 ppm. This report will also cite all malfunctions of the CEM equipment that monitors the SO₂ discharged from the SRU/SCOT Complex.

- b. If during any calendar month, the total monitored excess emissions of sulfur dioxide measured at Source P011 and P016 exceed the allowable emissions levels for more than 5% of the time during which the source and monitor are operating simultaneously, Ashland shall submit, in detail the following information:
 - i. The cause(s) for the exceedance(s); and
 - ii. The corrective action which had been and/or will be taken by Ashland to eliminate the cause(s) for the exceedance(s).
- c. Ashland will maintain daily records of sulfur produced from the combined sulfur recovery units (P011 and P016), and a monthly report of sulfur production will be submitted to the Division of Air Pollution Control, Canton City Health Department.
- d. A dated list of all H₂S flaring, steps taken to correct the concentration and volume of H₂S going to the flare, and tons of SO₂ discharged during the H₂S flaring.

These reports may be combined into a single report. These reports shall be submitted by not later than the fifteenth of each month and shall address the data from the previous calendar month.

These reports shall be submitted to the Division of Air Pollution Control, Canton City Health Department, 428 Market Avenue North, Canton, OH 44702 and to the Ohio EPA.

7. At the end of six months following the start-up of this second SRU, monthly reporting will cease. Ashland will submit a quarterly report by February 1, May 1, August 1, and November 1 of each year which will cover the previous calendar quarter and include the following information. This is consistent with 40 CFR 60.7(c) requirements to submit quarterly excess emission reports within 30 days following each calendar year.
 - a. A quarterly excess emissions report as outlined in 1a above; a sulfur production report as outlined in 1c above which shows monthly sulfur production; and an H₂S venting report as outlined in 1d above, and data assessment reports in accordance with 40 CFR Part 60, Appendix F.

- b. These reports may be combined into a single report.
 - c. These reports shall be submitted to the Division of Air Pollution Control, Canton City Health Department, 428⁰ Market Avenue North, Canton, OH 44702 and to the Ohio EPA.
8. Ashland shall install flow measuring devices to be used for quantification of emissions routed from the SRU to the flare. Subsequently, the data collected beginning with the activation of the relief valve until the release is over, shall be quantified and submitted to the Division of Air Pollution Control, Canton City Health Department and the Ohio EPA as part of the excess emissions report.

Ashland shall install and maintain an alarm system on the SRU which will immediately notify plant operators when a hydrogen sulfide (H_2S) venting situation develops. When an H_2S venting situation has been noted, the operator is to immediately notify the shift supervisor. Shift supervisors, once advised of an H_2S venting situation, are to take immediate steps to minimize or eliminate the venting. Whenever an H_2S venting situation develops, a supervisor on duty shall notify the Division of Air Pollution Control, Canton City Health Department by telephone as soon as possible. If the Division of Air Pollution Control, Canton City Health Department, is closed when the H_2S venting conditions develops, then the Division of Air Control, Canton City Health Department, is notified at the first opportunity during normal business hours. In addition, if the venting is considered a health risk, the shift supervisor on duty shall call the Ohio EPA Emergency Response number (1-800-282-9378) and shall advise that organization of the H_2S venting situation.

9. The standards of performance for this source, having an incinerated gas stream, will not discharge more than 250 ppm by volume of sulfur dioxide (SO_2) corrected to a dry oxygen-free basis as prescribed under 40 CFR Part 60, Subpart J.
10. This source shall utilize the existing SO_2 and O_2 monitors serving Source P011 which will be used to correct the sulfur dioxide CEM data to an oxygen-free basis. CEM maintenance requirements for the sulfur dioxide and oxygen CEM system will follow the procedures cited under 40 CFR Part 60, Appendix F.

11. Pursuant to the requirements of NSPS, Subpart J, Ashland shall continuously monitor and record the concentration of sulfur dioxide discharged from the SRU Unit -- thermal oxidizer. Section 60.13(e) of these standards requires that such continuous monitoring and recording equipment be in continuous operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.
12. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, Ashland shall continuously monitor and record by a device which provides an instantaneous readout of the temperature of the thermal oxidizer in order to ensure total sulfur oxidation to sulfur dioxide (SO₂).
13. Records required by this Permit to Operate shall be retained in the company's files for a period of not less than two years and shall be made available for inspection, by Ohio EPA or its authorized representative.
14. Ashland shall conduct and document a monthly pressure survey of the SRU.
15. Ashland shall comply with all of the provisions of their preventive maintenance and malfunction abatement plan and their quality assurance program for the continuous monitoring system.
16. Within 90 days after the initial start-up of source P016, Ashland shall perform a stack test for sulfur dioxide emissions on the combined operating units (P011 and P016) at or close to the maximum historical sulfur production of the combined units. Additional stack tests shall be performed on whatever combination of units (P011 and P016) are operating at the time the stack test is scheduled or ordered. The emissions from the common stack for source(s) P011 and P016 shall not exceed 21.1 pounds/hr. SO₂.

PREPARED BY: DANIEL J. SCHILTZ

DATE PREPARED: JANUARY 4, 1993