

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 06/11/93

Application No. 1576000301P016

Effective Date 06/11/93

Permit Fee \$270

This document constitutes issuance to:

ASHLAND PETROLEUM COMPANY
 2408 GAMBRINUS RD S.W./P.O. BOX 8170
 CANTON OHIO 44706

of a permit to operate for:

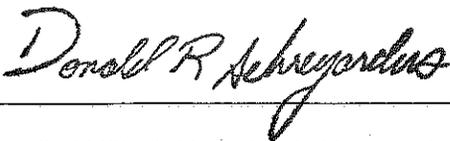
SULFUR RECOVERY UNIT
 NEW SULFUR RECOVERY UNIT

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

1. This permit to operate shall be effective until 06/11/96
 You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with 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 this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
 AIR POLLUTION CNTRL DIV. CANTON CITY HEALTH DEPT. -
 CITY HALL 420 MARKET AVE. NORTH
 CANTON, OH 44702-1544 (216)-489-3385
10. If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director



APPLICATION NUMBER: 15 76 00 0301 P016
FACILITY NAME: ASHLAND PETROLEUM COMPANY
EQUIPMENT DESCRIPTION: SULFUR RECOVERY UNIT
COMPANY ID: SULFUR RECOVERY UNIT (NEW)

SPECIAL TERMS AND CONDITIONS

1. Applicable State Regulation(s)

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

3745-31-05
3745-18-06

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

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 Testing Requirements

Within six months prior to the expiration of this permit, this facility shall conduct, or have conducted, an emission test(s) for this source(s) in accordance with procedures approved by this agency. This stack test 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/hour SO₂.

Two copies of the written report shall be submitted and signed by the person responsible for the test, describe in 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 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 Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702. This notice shall be made 30 days in advance and shall specify the source operation 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 sources and pollutants:

<u>Source</u>	<u>Pollutant(s)</u>
P016	SO ₂ *
P011	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 shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the CAPCD 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 emission 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 regularly 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. 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, 420 Market Avenue North, Canton, Ohio 44702.
- 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 no 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, 420 Market Avenue North, Canton, Ohio 44702 and to 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 ~~6A~~ above; a sulfur production report as outlined in ~~6C~~ above which shows monthly sulfur production; and an H₂S venting report as outline in ~~6D~~ 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, 420 Market Avenue North, Canton, Ohio 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 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 (H₂S) venting situation develops. When an H₂S venting situation has been noted, the operator is to immediately notify the shift supervisor. Shift supervisors, once advised of an H₂S venting situation, are to take immediate steps to minimize or eliminate the venting. Whenever an H₂S 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 will be notified at the first opportunity during normal business hours. In addition, if the venting is considered a health risk, the shift supervisors on duty shall call the Ohio EPA Emergency response number (1-800-282-9378) and shall advise that organization of the H₂S 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 (SO₂) corrected to a dry oxygen-free basis as prescribed under 40 CFR Part 60, Subpart J.
10. This source shall utilize the existing SO₂ and O₂ 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 representatives.
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.

PREPARED BY:

DANIEL J. SCHILTZ

DATE PREPARED:

MAY 12, 1993