



State of Ohio Environmental Protection Agency

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CERTIFIED MAIL

CANTON CITY HEALTH DEPT.  
AIR POLLUTION DIVISION  
TOXIC REVIEW

	PSD
	SYNTHETIC MINOR
Y	CEMS
40 CFR Part 63, Subpart CC, and Case-by-Case MACT	MACT
40 CFR Part 60, Subpart J, VV and GGG	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

RE: FINAL PERMIT TO INSTALL  
STARK COUNTY  
Application No: 15-01682  
Fac ID: 1576000301

DATE: 3/13/2008

Marathon Petroleum Company LLC, Canton  
Brent McNeese  
2408 Gambrinus Ave., SW  
Canton, OH 44706

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

Canton LAA



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**Permit To Install  
Terms and Conditions**

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**Issue Date: 3/13/2008  
Effective Date: 3/13/2008**

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**FINAL PERMIT TO INSTALL 15-01682**

Application Number: 15-01682

Facility ID: 1576000301

Permit Fee: **\$400**

Name of Facility: Marathon Petroleum Company LLC, Canton

Person to Contact: Brent McNeese

Address: 2408 Gambrinus Ave., SW  
Canton, OH 44706Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2408 Gambrinus Avenue SW  
Canton, Ohio**

Description of proposed emissions unit(s):

**State Federal PTI for the installation of an ultra-low sulfur diesel(ulsd)removal emissions unit.**

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

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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 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.

**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.

**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.
  - 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.

#### 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.

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

**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**

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**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	21.9
NOx	9.9
PE	4.8
SO2	5.8

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### 1. OAC rule 3745-31-10(C)

a. [OAC rule 3745-31-10(C)(1)]

The permittee shall document and maintain a record of the following information and shall have the record on-file before beginning actual construction:

- i. A description of the NSR project;
- ii. Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the NSR project; and
- iii. A description of the applicability test used to determine that the NSR project is not a major modification for any regulated NSR pollutant, including baseline actual emissions, the projected actual emissions, the amount of "could have accommodated" emissions excluded under paragraph (ZZZZ)(1)(c) of rule 3745-31-01 of the Administrative Code and an explanation for why such amount was excluded, and any netting calculations, if applicable.

b. [OAC rule 3745-31-10(C)(2)]

The information required in OAC 3745-31-10(C)(1) was documented and submitted to the Ohio EPA within the Permit to Install application for the ULSD Project.

c. [OAC rule 3745-31-10(C)(3)]

The permittee shall calculate the emissions of NO<sub>x</sub> and SO<sub>2</sub> from the emissions units affected by the ULSD Project (i.e., B023, B028, B029, B033, P011, and P016) as identified within the associated Permit to Install application, and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change.

d. [OAC rule 3745-31-10(C)(5)]

The permittee shall submit a report to the director if the annual emissions, in tons per year as calculated pursuant to OAC 3745-31-10(C)(3), from the ULSD Project, exceed 82.38 tons per year NO<sub>x</sub> and 52.76 tons per year SO<sub>2</sub> (i.e., the baseline actual emissions increase by a significant amount) and if such emissions differ from the preconstruction projection as documented and maintained pursuant to OAC rule 3745-31-10(C)(1). Such reports shall be submitted to the director within sixty (60) days after the end of such year. The report shall contain the following:

- i. The name, address, and telephone number of the major stationary source;
- ii. The annual emissions as calculated pursuant to OAC rule 3745-31-10(C)(3).

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

None

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

#### A. State and Federally Enforceable Section

#### I. Applicable Emissions Limitations and/or Control Requirements

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

#### Operations, Property, and/or Equipment - (B033) - ULSD Reactor Charge Heater - 55 mmBtu/hr. and fugitive components

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>4.53 lbs CO/hr; and            19.8 tons CO/year.</p> <p>See section A.1.2.c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-31-05(C) and 40 CFR Part 60, Subpart J for emissions unit B033 and OAC rule 3745-21-09(T), 40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subparts GGG and VV for the fugitive VOC emissions from the associated components of emissions unit B033 (see section A.1.2.d).</p>
ORC 3704.03(T)(4)	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.020 lb PE/MMBtu of actual heat input under OAC rule 3745-17-10(B)(1).</p>
OAC rule 3745-31-05(C)	<p>Permit to Install 15-01682 for this air contaminant source takes into account the following voluntary emission limitations as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):</p> <p>9.9 tons NOx/year; and            0.025 lb SO<sub>2</sub>/MMBtu of actual heat input.</p>
OAC rule 3745-17-10(B)(1)	0.020 lb PE/MMBtu of actual heat input
OAC rule 3745-17-07(A)	20% opacity as a 6-minute average, except as provided by rule.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-08(B)	See section A.I.2.e.
OAC rule 3745-18-82(E)(2)	The lb SO <sub>2</sub> /MMBtu emission limitation established pursuant to this rule is less stringent than the lb SO <sub>2</sub> /MMBtu emission limitation established pursuant to OAC rule 3745-31-05(C).
OAC rule 3745-21-09(T) 40 CFR Part 63, Subpart CC 40 CFR Parts 60, Subpart GGG and VV	The permittee's plantwide Leak Detection and Repair (LDAR) program shall comply with the requirements of OAC rule 3745-21-09(T), 40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subparts VV and GGG.
40 CFR Part 60.1014(a)(1) (Subpart J)	The permittee shall not burn refinery fuel gas containing hydrogen sulfide (H <sub>2</sub> S) in excess of 0.10 grain H <sub>2</sub> S per dscf of refinery fuel gas.

## 2. Additional Terms and Conditions

- 2.a** The application and enforcement of the provisions of the New Source Review Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- 2.b** The ULSD Reactor Charge Heater (B033) fires fuel gas to preheat a distillate stream for treatment in the ULSD Reactor. Therefore emissions unit B033 meets the definition of a "process heater" rather than "steam generating unit" as these terms are defined in 40 CFR 60.41(c) and, therefore, is not subject to the requirements of 40 CFR Part 60, Subpart Dc.
- 2.c** The lbs/hr and tons/yr emission limitations for CO are based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure compliance with these emission limitations.
- 2.d** BAT for the control of fugitive VOC emissions from the associated components of emissions unit B033 (valves, pumps, drains, compressors and flanges as specified in the PTI application dated August, 2007) shall be satisfied through implementation of and compliance with the permittee's approved Leak Detection and Repair (LDAR) Program.
- 2.e** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## II. Operational Restrictions

1. The permittee shall burn only a mixture of refinery fuel gas, natural gas, and/or landfill gas in this emission unit. Hereinafter, this mixture of fuel gases shall be referred to as "refinery fuel gas". The sulfur content of the refinery fuel gas burned in this emissions unit shall comply with the allowable SO<sub>2</sub> emission limitation specified in section A.I.
2. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices, at all times, including periods of startup, shutdown, and malfunction, for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in 40 CFR Part 60.6(e)(3), review of operation and maintenance records, and inspection of the source.

## III. Monitoring and/or Record keeping Requirements

1. The permittee shall continuously sample and analyze the refinery fuel gas for hydrogen sulfide content using the H<sub>2</sub>S CEMS required in section A.III.2 and maintain records of the analytical results.
2. The permittee shall operate and maintain existing equipment to continuously monitor and record the concentrations of H<sub>2</sub>S in the refinery fuel gas burned in this emissions unit, in units of ppm. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. The span value for this instrument shall be 425 mg H<sub>2</sub>S/dscm.
3. A statement of certification of the existing H<sub>2</sub>S CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in

accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 7. Proof of certification shall be made available to representatives of the Canton City Health Department, Air Pollution Control Division upon request.

4. The permittee shall maintain records of all data obtained by the H<sub>2</sub>S CEMS including, but not limited to, parts per million (ppm) of H<sub>2</sub>S, ppm of H<sub>2</sub>S as a rolling, 3-hour average, the results of daily zero/span calibration checks, and the magnitudes of manual calibration adjustments.
5. The permittee shall maintain the written quality assurance/quality control plan for the CEMS that is designed to ensure continuous valid and representative readings of H<sub>2</sub>S. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. Records for the monitoring system must be kept on site and available for inspection during regular office hours.
6. The permittee shall collect samples, at least three times per week, of the refinery fuel gas for gas chromatographic analysis. The permittee shall collect refinery fuel gas samples using procedures that will ensure that sample containers are adequately purged prior to sample collection, thereby, ensuring a representative fuel gas sample. The permittee shall maintain a copy of the sampling procedures on site.
7. The permittee shall maintain weekly records of the actual heating value of the average weekly refinery fuel gas as burned in this emissions unit. The actual heating value (H), in Btu per scf, of the refinery fuel gas shall be calculated as follows from the results of a weekly refinery fuel gas compositional analysis using gas chromatography:

$H = \text{summation of } (h_i \times m_i)$

$m_i$  = the mass fraction of each chemical compound detected in the refinery fuel gas using

chromatographic analysis; and

$h_i$  = the higher heating value of each chemical compound detected in the refinery fuel gas, in Btu per pound of chemical, as found in the most recent edition of the Gas Processors Supplies Association Engineering data manual.

8. The permittee shall use one of the following methods to conduct the compositional analysis of the refinery fuel gas samples:
  - ASTM D1945-96
  - ASTM D1945-96 (Wasson Modification)
  - GPA Method 2261-90

When using the Wasson Modification of ASTM Method D1945-96, the permittee shall follow, at a minimum, QA/QC requirements specified in ASTM D1945-96. The permittee shall also operate and maintain the Wasson gas chromatographic instrumentation according to the manufacturer's specifications and recommendations. Alternative, equivalent methods may be used upon written approval by the Canton City Health Department, Air Pollution Control Division.

9. The permittee shall maintain weekly and monthly records of each calculated, weekly and monthly average of the sulfur dioxide emission rate, in pounds per MMBTU, discharged from this emissions unit. The sulfur dioxide emission rate shall be calculated as follows:

$$\frac{[(\text{Weekly average H}_2\text{S concentration, in ppmv}) \times (1 \text{ scf H}_2\text{S}/1 \times 10^6 \text{ ppmv}) \times (1 \text{ mole H}_2\text{S}/379 \text{ scf H}_2\text{S}) \times (1 \text{ mole SO}_2/\text{mole H}_2\text{S}) \times (64 \text{ pounds of SO}_2/\text{mole SO}_2)]}{(\text{weekly average recorded heating value of the refinery fuel gas})} = \text{sulfur dioxide mass emission rate}$$

10. For each day during which the permittee burns a fuel other than refinery fuel gas, the permittee shall maintain a record of the type, quantity, sulfur content (in pound of sulfur per MMdscf) and heating value (in Btu/dscf) of the fuel burned.
11. Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO<sub>x</sub> monitoring system meets the requirements of Performance Specifications 2 and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

12. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system and record the output of the system, for measuring NO<sub>x</sub> emissions.
13. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system, designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

14. The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of lbs NO<sub>x</sub>/hr and lb NO<sub>x</sub>/mmBtu. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

15. The permittee shall maintain records of data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:
  - a. emissions of NO<sub>x</sub> in parts per million on an instantaneous (one-minute) basis;
  - b. emissions of NO<sub>x</sub> in ppmv and pounds per hour;
  - c. results of quarterly cylinder gas audits;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
16. The permittee shall calculate and maintain records of total NO<sub>x</sub> emissions, in tons/yr, from emissions unit B033.
17. The permittee shall maintain monthly records of the amount of gas, in dscf of gas, used as fuel in B033 and the average monthly Higher Heating Value (HHV) for each gas used as fuel in Btu/dscf of gas burned.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each weekly average SO<sub>2</sub> emission rate, as calculated in section A.III.9, that exceeds the SO<sub>2</sub> emission limitation in section A.I.1.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than refinery fuel gas is burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton City Health Department, Air Pollution Control Division documenting any H<sub>2</sub>S CEMS downtime while the emissions unit was on line (date,

time, duration, and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of source and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

4. Pursuant to 40 CFR Part 60.7, the permittee shall submit H<sub>2</sub>S concentration reports within 30 days following the end of each calendar quarter to the Canton City Health Department, Air Pollution Control Division. These reports shall contain the date, commencement and completion times, and durations of all instances of rolling, 3-hour H<sub>2</sub>S concentrations in excess of the 0.10 gr/dscf limitation, and the corrective actions taken (if any). If there are no concentrations of H<sub>2</sub>S in the refinery fuel gas greater than the value specified in section A.I during the calendar quarter, then the permittee shall submit a statement to that effect.
5. The permittee shall submit to the Administrator of the US EPA and the Canton local air agency the performance test data from the initial performance test and the performance evaluation of the CEMS using Performance Specification 2 for NO<sub>x</sub> and PS 4A for CO. The permittee shall also submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the process heater.
6. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - iii. the location of the continuous NO<sub>x</sub> monitor;
    - iv. the exceedance report as detailed in (a) above;

- v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
- viii. results and date of quarterly cylinder gas audits;
- ix. results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

\* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

7. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations from the annual NO<sub>x</sub> emission limitation in section A.I.1.

## V. Testing Requirements

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

- a. Emission Limitation:

0.025 lb SO<sub>2</sub>/MMBtu

Applicable Compliance Method:

The permittee shall demonstrate compliance by the use of the monitoring and record keeping requirements specified in section A.III.9.

b. Emission Limitations:

4.53 lbs CO/hr

19.8 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the lbs/hr emission limitation by multiplying the maximum hourly heat capacity in MMBtu/hr by the emission factor of 84 lbs/mmescf from AP-42 (7/1998) and dividing by the standard natural gas heat content of 1020 Btu per scf as specified in Table 1.4-1 of AP-42.

If required, compliance with the lbs/hr emission limitation shall be determined through emission testing in accordance with US EPA Methods 1-4 and 10 of 40 CFR Part 60, Subpart A.

Compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lbs/hr emission limitation (i.e., the annual emission limitation was established by multiplying the lbs/hr emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton).

c. Emission Limitation:

9.9 tons NOx/year.

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the monitoring and record keeping requirements specified in sections A.III.15 and A.III.16 and the following calculation:

Multiply each 30 day rolling average, in lbs NOx/MMBtu, by the average monthly HHV for the gas burned by the total amount of gas burned per month and convert to lbs NOx per month and tons per year for the previous 12 month period.

d. Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emission observations performed in accordance with US EPA Method 9, 40 CFR Part 60, Appendix A.

e. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be determined through emission testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Subpart A.

f. Emission Limitation:

The permittee shall not burn refinery fuel gas containing hydrogen sulfide in excess of 0.10 grain H<sub>2</sub>S per dscf of refinery fuel gas.

Applicable Compliance Method:

The permittee shall demonstrate compliance by the use of the monitoring and record keeping requirements specified in section A.III.4.

2. The permittee shall conduct, or have conducted, emission testing for carbon monoxide and the percent oxygen, at each emissions point from the subject process heater in accordance with the following requirements.

a. Performance testing shall be conducted no later than 180 days following the startup of each process heater and on an annual basis thereafter for carbon monoxide (between 10 and 12 months after the previous performance test).

b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass CO emission rate:

Method 1, Appendix A, Part 60 to select the sampling ports locations and number of traverse points;

Method 2, 2F, or 2G, Appendix A, Part 60 to determine the velocity and volumetric flow-rate of the stack gases;

Method 3A or 3B, Appendix A, Part 60, or other method allowed per Table 5 of the Subpart to determine the oxygen and/or carbon dioxide concentrations, excess air, and dry molecular weight of the stack gases;

Method 4, Appendix A, Part 60 to measure the moisture content of the stack gases;

Method 10, 10A, or 10 B, Appendix A, Part 60 for carbon monoxide

c. Each performance test shall consist of three separate runs using the applicable test method. Each run shall last at least one hour and shall be conducted under

the conditions specified in the Method. The arithmetic mean of the results of the three runs shall be used for the purpose of determining compliance with the limitations.

- d. The test(s) shall be conducted while the process heater is operating at its maximum normal operating load while burning non-residual oil. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of the performance test. The permittee shall make available to the Ohio EPA, Division of Air Pollution Control, Central Office or the appropriate District Office or local air agency, upon request, any records that may be necessary to determine the conditions of the performance tests.
- e. The permittee shall notify the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency in writing and at least 30 calendar days before a performance test is initially scheduled to begin, of plans to conduct a performance test. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the monitored operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Division of Air Pollution Control's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA, Division of Air Pollution Control, District Office, local air agency, or Central Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of each emissions unit and the testing procedures provide a valid characterization of the emissions from each emissions unit.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and shall be submitted to the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency within 30 days following completion of the test(s).
- h. In the event the permittee is unable to conduct the performance test on the date specified in the notification requirement due to unforeseeable circumstances beyond control, the permittee shall notify the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other applicable provisions of this part or with any other applicable federal, State, or local requirement.
- i. The permittee shall maintain performance test results and any other data needed to determine emissions from each emissions unit for a minimum of 5 years after the testing is conducted or after the data is collected. These records shall be

made available for inspection by the Director of the Ohio EPA or his/her representative, upon request.

3. The permittee shall provide, or have provided, performance testing materials and conditions favorable for stack testing. Air pollution control systems shall be constructed such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and the stack or duct shall be free of cyclonic flow during performance testing. The following conditions shall be provided:
  - a. sampling ports adequate for the appropriate testing methods;
  - b. safe sampling platform(s);
  - c. safe access to sampling platform(s);
  - d. utilities for sampling and testing equipment; and
  - e. any other facilities that the Ohio EPA, Division of Air Pollution Control representative deems necessary for safe and adequate testing of each emissions unit.

**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.

**Operations, Property, and/or Equipment - (B033) - ULSD Reactor Caharge Heater - 55 mmBtu/hr. and fugitive components**

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

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

