OhioEPA

State of Ohio Environmental Protection Agency

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Lazarus Gov. Center
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Columbus, OH 43215

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P.O. Box 1049
Columbus, OH 43216-1049

RECEIVED
MAR 26 2001
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01452

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR PART 60, SUBPART GGG	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 3/15/2001

Marathon Ashland Petroleum LLC-Canton
Brent McNeese
2408 Gambrinus Avenue 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

CC: USEPA Canton LAA

FINAL PERMIT TO INSTALL 15-01452

Application Number: 15-01452

APS Premise Number: 1576000301

Permit Fee: **$400**

Name of Facility: Marathon Ashland Petroleum LLC-Canton

Person to Contact: Brent McNeese

Address: 2408 Gambrinus Avenue SW
Canton, OH 44706

Location of proposed air contaminant source(s) [emissions unit(s)]:
2408 Gambrinus Avenue SW
Canton, Ohio

Description of proposed emissions unit(s):
THIS PTI IS A MODIFICATION OF PTI 15-01319,FUGITIVE VOC LEAKS FROM REFINERY EQUIPMENT. THE PURPOSE OF THIS MODIFICATION IS TO ADD VALVING TO BE INSTALLED ON A GAS CON DEBUTANIZER AIR COOLED EXCHANGER.

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and

October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition

depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

   ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the

emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

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

extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

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

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

7. 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.

8. 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).

9. Construction Compliance Certification

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	1.2

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

NONE

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P022 - FUGITIVE VOC LEAKS FROM PETROLEUM REFINERY EQUIPMENT (Gas Con Debutanizer Overhead Air-Cooled Exchanger (GCDOAE)).	OAC rule 3745-21-09(T)	No limits
	40 CFR Part 60, Subpart GGG	No limits (See section A.I.2.a.)
	OAC rule 3745-31-05(A)(3)	1.2 tons VOC/year This limit is for VOC fugitive emissions from the gas con debutanizer overhead air-cooled exchanger (GCDOAE).

2. Additional Terms and Conditions

2.a 40 CFR 60 Subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries is applicable to all the GCDOAE equipment in light liquid/vapor service because this project constitutes a capital expenditure. In order to comply with 40 CFR 60 Subpart GGG, the permittee has agreed to comply with the monitoring, record keeping, and reporting restrictions specified in 40 CFR Part 60.482-1, 60.482-7, 60.482-9, 60.485, 60.486, and 60.487.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall develop and implement a monitoring program which incorporates the monitoring of any equipment in light liquid, vapor or gas service in accordance with the methods specified in paragraph (F) of OAC rule 3745-21-10 within five working days after the repair of a leak.

2. As required by OAC rule 3745-21-09(T), if a VOC leak is measured at a concentration which exceeds ten thousand parts per million by volume, a tag shall immediately be placed on the leaking

component. The tag shall be readily visible and weatherproof; it shall bear an identification number, and it shall clearly indicate the date the leak was detected. The tag shall remain in place until the leaking component is repaired. A leak is detected if an instrument reading of 10,000 ppm or greater is measured.

3. A monitoring log shall be maintained for all leaking components which are tagged. The monitoring log shall contain, at a minimum, the following data:

   a. the name of the process unit where the leaking component is located;

   b. the type of leaking component (such as valve, seal, or other component);

   c. the tag number of the leaking component;

   d. the date on which the leaking component was detected;

   e. the date on which the leaking component was repaired and the repair method applied in each attempt to repair the leak;

   f. the date and results of the monitoring performed within five working days after the leaking component was repaired;

   g. a record of the calibration of the monitoring instrument and the instrument and operator identification numbers;

   h. a list of those leaking components which cannot be repaired until the next process unit turnaround;

   i. the total number of components monitored and the total number of components found leaking during the calendar year;

   j. the phrase "above 10,000" if the maximum instrument reading measured after each repair attempt is equal to or greater than 10,000 ppm;

   k. the phrase "repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery and the expected date of successful repair if the leak is not repaired within 15 days.

   l. the signature of the permittee or his designate whose decision it was that repair could not be effected without a process shutdown; and

   m. dates of process unit shutdown that occur while the equipment is unrepaired.

4. As required by OAC rule 3745-21-09(T), a copy of any monitoring log shall be retained by the permittee for a minimum of two years after the date on which the record was made or the report was

prepared. A copy of any monitoring log shall immediately be made available to the Canton LAA upon verbal or written request, at any reasonable time.

5. As required by OAC rule 3745-21-09(T), the permittee shall repair and retest any leaking component which is tagged, as soon as possible, but no later than 15 days after the leak is found unless the leaking component cannot be repaired until a process turnaround occurs.

6. As stated in OAC rule 3745-21-09(T), the director may require a process unit turnaround to occur earlier than the normally scheduled date if the number and severity of leaking components awaiting a turnaround warrant such action. Any such process unit turnaround shall be required by means of an order issued by the director to the permittee of the petroleum refinery pursuant to Division (R) of Section 3704.03 of the Revised Code.

7. As stated in OAC rule 3745-21-09(T), the director may accept an alternative monitoring, recordkeeping and reporting program if the permittee can demonstrate to the satisfaction of the director that the alternative program is at least as effective in identifying, documenting and reporting leaks from petroleum refinery equipment as the program outlined in OAC rule 3745-21-09(T)(1). Any proposed alternative program which the director finds comparable to the requirements of OAC rule 3745-21-09(DD)(12) or (DD)(13) shall be acceptable to the director.

8. In addition to the requirements specified in OAC rule 3745-21-09(T), the permittee shall include the following monitoring activities within the LDAR program:

   a. each valve in light liquid/vapor service shall be monitored monthly to detect leaks by the methods specified in 40 CFR Part 60.485 as part of the Leak Detection and Repair (LDAR) program specified in section A.III.1.

   b. If a leak is detected in a valve or a flange, the component shall be monitored monthly until a leak is not detected for 2 successive months. The identification tag on a valve may be removed after it has been monitored for 2 successive months and no leak has been detected during those 2 months. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next calendar quarter until a leak is detected.

   c. A first attempt at repair of a leak shall be made no later than 5 calendar days after each leak is detected. First attempts at repair for valves and flanges include, but are not limited to, the following best practices where practicable:

      i. tightening of bonnet bolts;

      ii. replacement of bonnet bolts;

      iii. tightening of packing gland nuts; and

      iv. injection of lubricant into lubricated packing.

d. Any valve that is designated as having no detectable emissions as defined specified in 40 CFR Part 486.(e)(2), as indicated by an instrument reading of less than 500 ppm above background, is exempt from inclusion in the LDAR program if the valve:

   i. has no external actuating mechanism in contact with the process fluid;

   ii. is operated with emissions less than 500 ppm above background; and

   iii. is tested for compliance with section A.III.2 initially upon designation, annually, and at other times requested by the Administrator.

e. Any valve that is designated, as described in 40 CFR Part 60.486(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of section A.III.1 if:

   i. the permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger; and

   ii. the permittee adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times.

f. Any valve that is designated, as described in § 60.486(f)(2), as a difficult-to-monitor valve is exempt from the requirements of section A.III..1 if:

   i. the permittee demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;

   ii. the process unit within which the valve is located either becomes an affected facility through 40 CFR Part 60.14 or 40 CFR Part 60.15, or the permittee designates less than 3.0 percent of the total number of valves as difficult to monitor; and

   iii. the permittee follows a written plan that requires monitoring of the valve at least once per calendar year.

9. Standards for Delay of Repair {40 CFR, Part 60.482-9}

a. Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

b. Delay of repair for valves will be allowed if:

   i. the permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair; and

   ii. when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR Part 60.482-10.

c. Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

10. The following information pertaining to all valves subject to the requirements of sections A.III.8.e and A.III.8.f shall be recorded in a log that is kept in a readily accessible location:

a. a list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;

b. a list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve;

c. a list of identification numbers of equipment subject to these terms and conditions;

d. a list of identification numbers for equipment that are designated for no detectable emissions under the monitoring program. The designation shall be signed by the permittee or his designate;

e. the dates of compliance tests conducted, the background level measured during each compliance test, and the maximum instrument reading measured at the equipment during each compliance test;

f. a schedule of monitoring;

g. the percent of the total number of valves monitored found leaking during each monitoring period;

h. information and data used to demonstrate that a piece of equipment is not in VOC service; and

i. the following information for use in determining exemptions:

   i. an analysis demonstrating the design capacity of the affected facility
   ii. a statement listing the feed or raw materials and products from the affected facility and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and
   iii. an analysis demonstrating that equipment is not in VOC service

11. The permittee may elect to comply with alternative standards for valves specified in 40 CFR Part 60.483-1 or 40 CFR Part 60.483-2 including all applicable monitoring and record keeping requirements specified in 40 CFR Parts 60.482-7 and 60.486.

IV. Reporting Requirements

1. The permittee shall submit a quarterly report which identifies the following during each of the previous three calendar months:

   a. process unit identification;

   b. the total number of components monitored;

   c. the total number of components found to be leaking;

   d. the identity of components which were found to be leaking and which were not repaired within fifteen days;

   e. the identity of all leaking components which cannot be repaired until the next process turnaround;

   f. the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible; and

   g. dates of process unit shutdowns which occurred within the reporting period.

2. The permittee is already submitting a report for fugitive VOC leaks from components in the rest of the facility. The permittee is not required to submit a separate report for the components associated with the Vacuum Unit Tailgas Compressor System or the GCDOAE but can simply include them into this existing report.

3. The quarterly report shall be submitted to the Administrator, U.S. EPA and the Canton laa. The reports shall be submitted quarterly, i.e., by January 15, April 15, July 15, and October 15 of each year and shall cover the previous calendar quarters.

4. If the permittee elects to comply with the provisions of §§ 60.483-1 and 60.483-2, the permittee shall notify the Administrator of the alternative standard selected 90 days before implementing either of the provisions.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P022 - FUGITIVE VOC LEAKS FROM PETROLEUM REFINERY EQUIPMENT (Gas Con Debutanizer Overhead Air-Cooled Exchanger (GCDOAE)).		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. Compliance Methods and Testing Requirements

None

VI. Miscellaneous Requirements

None