



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RECEIVED

MAY 29 2003

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01518

CANTON CITY HEALTH DEPT AIR POLLUTION DIVISION	TOXIC REVIEW
Y	PSD
Y	SYNTHETIC MINOR
40 CFR Part 63	CEMS
40 CFR Part 60, Subpart J	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/22/2003

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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

Canton LAA



**Permit To Install
Terms and Conditions**

**Issue Date: 5/22/2003
Effective Date: 5/22/2003**

FINAL PERMIT TO INSTALL 15-01518

Application Number: 15-01518
APS Premise Number: 1576000301
Permit Fee: **\$800**
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):
Fluidized Catalytic Cracking(FCC) Unit Modification for new blower installation.

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 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 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.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 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 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.

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

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

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. 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.

5. 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.

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

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.

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., 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	239
NOx	301
SO2	533
VOC	7.5

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Fluidized Catalytic Cracking Unit(FCC). This emissions unit has a rated capacity of 24,500 bbls/day of fresh feed.	OAC rule 3745-31-05(A)(3)	0.62 pound of sulfur dioxide per one thousand pounds of fresh feed. 533 tons SO ₂ per year 71 lbs NO _x per hour 301 tons NO _x per year See section A.I.2.h
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule
	OAC rule 3745-17-11(A)	77 pounds PE per hour 239 tons PE per year
	OAC rule 3745-18-82(E)(5)	The emission limitation specified by this rule is as stringent as the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart J	See section A.I.2.d.
	OAC rule 3745-21-09(T)	See section A.I.2.b.
	40 CFR Part 63 Subpart CC	See section A.I.2.b.
	40 CFR Part 63 Subpart UUU OAC rule 3745-21-09(VV)	See section A.I.2.c. See section A.I.2.a.

3. The maximum annual production rate for this emissions unit shall not exceed 8,185,125 bbls fresh feed/year based on a rolling, 12 month summation of the production rates.

III. Monitoring and/or Record keeping Requirements

1. Pursuant to the requirements of 40 CFR Part 51, Appendix P, "Minimum Emission Monitoring Requirements", the permittee shall operate and maintain a continuous opacity monitoring system (COM) for continuously monitoring and recording the opacity of particulate emissions from this emissions unit. The COM shall comply with the requirements specified in 40 CFR Part 60.13. The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
 - a. The permittee shall maintain records of all data obtained by the COM system including percent opacity on an instantaneous (one-minute) and six-minute block average basis, results of daily zero/span calibration checks, and magnitude calibration adjustments.
 - b. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall include a letter from Ohio EPA detailing the results of an agency review of the certification tests and a statement by Ohio EPA that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Canton LAA upon request.
2. The permittee shall continue to operate and maintain existing equipment to continuously monitor and record oxygen from this emissions unit in units of percent oxygen. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
 - a. The permittee shall maintain records of all data obtained by the continuous oxygen monitoring system including, but not limited to, percent oxygen on a instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration. Records shall be maintained at the facility for a period not less than three years.
 - b. The permittee shall monitor, calculate, and record the average percent oxygen level for each hour of operation of the FCC unit. These oxygen levels shall be compared to 0.50% oxygen for the purpose of determining compliance with OAC rule 3745-21-09(VV)(1)(d).
 - c. A statement of certification of the existing continuous oxygen monitoring system 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 3. Proof of certification shall be made available to the Canton local air agency upon request.

3. The permittee shall utilize a continuous temperature monitoring system to calculate and record the rolling three-hour average temperature of the regenerator flue gas for each hour of operation of the FCC unit. The temperature shall be measured in units of degrees Fahrenheit. The monitoring device shall consist of a type K thermocouple having an accuracy of at least +/- 0.35% or better. The monitor and recording device shall be operated and maintained in accordance with the manufacturer's recommendations.
4. A statement of certification of the existing continuous CO monitoring system 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 4 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director of Ohio EPA or the local air agency upon request.

The permittee shall operate and maintain existing equipment to continuously monitor and record CO from this emissions unit in units of ppmv, on a dry basis. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, parts per million CO on an instantaneous(one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. A statement of certification of the existing continuous NOx monitoring system 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 6 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director of Ohio EPA or the local air agency upon request.

The permittee shall operate and maintain existing equipment to continuously monitor and record NOx from this emissions unit in units of ppmv, on a dry basis and in pounds NOx per hour. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx on an instantaneous(one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. A statement of certification of the existing continuous SO2 monitoring system 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 6 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director of Ohio EPA or the local air agency upon request.

The permittee shall operate and maintain existing equipment to continuously monitor and record SO₂ from this emissions unit in units of ppmv, on a dry basis and in lbs SO₂/1000 lbs of fresh feed. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO₂ monitoring system including, but not limited to, parts per million SO₂ on an instantaneous(one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

7. The permittee shall maintain monthly records of the following information:
 - a. The production rate for each month; and
 - b. The rolling, 12 month summation of production rates.
8. All recorded monitoring data for oxygen and temperature shall be retained at the facility for a minimum period of three years.

IV. Reporting Requirements

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).
2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting any continuous opacity monitoring system 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 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 reports.
3. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring systems malfunctions. The total operating time of the emissions unit was on line also shall be included in the quarterly report. The quarterly excess

emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Canton local air agency within 30 days following the end of each calendar quarter in a manner prescribed by the Canton local air agency.
5. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting all instances when the hourly average oxygen values deviate from the limitation specified in OAC 3745-21-09(VV), detailing the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting any continuous oxygen monitoring system 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 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 reports. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

6. The permittee shall submit quarterly deviation (excursion) reports that identify each period when any rolling, 3-hour average temperature is below 1300 degrees Fahrenheit.
7. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting all instances of CO values in excess of the limitations specified in section A.I.1 detailing the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting any continuous CO monitoring system 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 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 reports.

8. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting all instances of NOx values in excess of the limitations specified in section A.I.1 detailing the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting any continuous NOx monitoring system 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 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 reports.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring systems malfunctions. The total operating time of the emissions was on line also shall be included in the quarterly report. The quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Canton local air agency within 30 days following the end of each calendar quarter in a manner prescribed by the Canton local air agency.

9. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting all instances of SO2 values in excess of the limitations specified in section A.I.1 detailing the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton local air agency documenting any continuous SO2 monitoring system 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 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 reports.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring systems malfunctions. The total operating time of the emissions was on line also shall be included in the quarterly report. The quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Canton local air agency within 30 days following the end of each calendar quarter in a manner prescribed by the Canton local air agency.

10. The permittee shall submit deviation(excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for nitrogen oxides and sulfur dioxides.
11. The permittee shall submit annual reports that identify any exceedances of the rolling, 12 month production rate limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

The monitoring and record keeping requirements under A.III.1 shall be used to demonstrate compliance. If required, Method 9 of 40 CFR Part 60, Appendix A shall be used to demonstrate compliance.

- b. Emissions Limitation:

77 pounds per hour particulate emissions
239 tons PE per year

Applicable Compliance Method:

If required, the procedures specified under OAC rule 3745-17-03(B)(10) shall be used to demonstrate compliance with the hourly emission limit. Compliance with the annual PE limit shall be demonstrated by maintaining records of the amount of fresh feed processed through the FCC Unit on a rolling, 12-month summation of production rates. By limiting the fresh feed processed through this emissions unit to 8,185,125 bbls fresh feed/year, annual emissions will be restricted to:

$8,185,125 \text{ bbls fresh feed/yr} \times 58.4 \text{ pounds of PE/Mbbls of fresh feed} \times 1/2000$
 $= 239 \text{ tons PE/yr}$

- c. Emissions Limitation:

0.62 pound sulfur dioxide per thousand pounds of fresh feed
533 tons SO₂ per year

Applicable Compliance Method:

The monitoring and record keeping requirements under A.III.6 shall be used to demonstrate compliance with the pounds sulfur dioxide per 1000 pounds of fresh feed limitation. If required, the procedures specified under OAC rule 3745-18-04(A) shall be used to demonstrate compliance with the pounds sulfur dioxide per 1000 pounds of fresh feed limitation. The permittee shall calculate a rolling, 12 month summation of the total monthly SO₂ emissions to demonstrate compliance with the annual rolling, 12 month limitation. The total monthly SO₂ emissions shall be calculated as shown below:

(Average hourly SO₂ concentration, in lbs SO₂/1000 lbs fresh feed from the CEMS data) x (quantity of fresh feed processed in the FCC Unit per day, in 1000 lb increments of fresh feed) (number of operating hours for the FCC Unit per month) = total calculated monthly SO₂ emissions

d. Emissions Limitation:

72 lbs NO_x per hour
301 tons NO_x per year

Applicable Compliance Method:

The monitoring and record keeping requirements in section A.III.5 shall be used to demonstrate compliance with the hourly emission limitation. The permittee shall calculate a rolling, 12 month summation of the total monthly NO_x to demonstrate compliance with the annual rolling, 12 month limitation. The total monthly NO_x shall be calculated as specified below:

(Average hourly NO_x concentration, in lbs NO_x/hr. from the CEMS data) x (number of operating hours for the FCC Unit per month) = total calculated monthly NO_x emissions

e. Emissions Limitation:

500 ppmvd CO as a one-hour average

Applicable Compliance Method:

The Monitoring and/or Record keeping Requirements of A.III.4 shall be used to demonstrate compliance. If required, Method 10 of 40 CFR Part 60, Appendix A shall be used to demonstrate compliance. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emissions Limitation:

The temperature of the flue gas exiting the regenerator section of the FCC unit shall not be less than 1300 degrees Fahrenheit as a 3-hour rolling average while the FCC is operating. The oxygen content of the flue gas shall be maintained at 0.5%, by volume, or greater.

Applicable Compliance Method:

The Monitoring and/or Record keeping Requirements of A.III.2 and A.III.3, respectively, shall be used to demonstrate compliance.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Fluidized Catalytic Cracking Unit(FCC)	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