



State of Ohio Environmental Protection Agency

Street Address:

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

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

RE: **DRAFT PERMIT TO INSTALL MODIFICATION**

CERTIFIED MAIL

LUCAS COUNTY

Application No: 04-00959

Fac ID: 0448020007

DATE: 3/14/2006

BP Products North America Inc

Allen Ellett

P.O. Box 696

Toledo, OH 43697-0696

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
Y	CEMS
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	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 1000** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section

Division of Air Pollution Control

CC: USEPA

TDES

Toledo Metro Area Council of Gov.

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PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **04-00959** FOR AN AIR CONTAMINANT SOURCE FOR
BP Products North America Inc

On 3/14/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **BP Products North America Inc**, located at **4001 Cedar Point Road, Oregon, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-00959:

Administrative modification of PTI 04-959 issued October 18, 1995, to update emission factors.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]



DRAFT MODIFICATION OF PERMIT TO INSTALL 04-00959

Application Number: **04-00959**
APS Premise Number: **0448020007**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **BP Products North America Inc**
Person to Contact: **Allen Ellett**
Address: **P.O. Box 696**
Toledo, OH 43697-0696

Location of proposed air contaminant source(s) [emissions unit(s)]:
4001 Cedar Point Road
Oregon, OHIO

Description of modification:
Administrative modification of PTI 04-959 issued October 18, 1995, to update emission factors.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

BP Products North America Inc

Facility ID: 0448020007

PTI Application: 04-00959

Modification Issued: To be entered upon final issuance

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **BP Products North America Inc** located in **LUCAS** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B031	Vac 1 Furnace/ 130 MMBTU/hr Refinery Fuel Gas Fired Heater	Use of low NO _x burners	3745-31-05 40 CFR Part 60.100 (NSPS Subpart J) 40 CFR Part 60 App. B & F 3745-17-07 3745-17-10 3745-23-06 (B)	2.8 lbs/hr/SO ₂ ; 0.07 lb NO _x /MMBTU and 9.1 lbs/hr NO _x ; 0.24 lb/hr PM 10.71 lbs/hr CO 1.11 lbs/hr OC

SUMMARY**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Net Increase, Tons/Year</u>
Carbon Monoxide	46.9	39.1
Organic Compounds	4.9	4.1
Oxides of Nitrogen	39.9	14.1
Particulate Matter	1.1	0.6
Sulfur Dioxide	12.9	5.6

BP Products North America Inc

Facility ID: **0448020007**

PTI Application: 04-00959

Modification Issued: To be entered upon final issuance

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B031	Refinery Fuel Gas Fired Heater	J

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Air Quality Modeling and Planning
 P.O. Box 1049
 Columbus, OH 43216-1049

and Toledo Pollution Control Division
 26 Main Street
 Toledo, Ohio 43605

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the

time, date, place and person(s) conducting such tests.

B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

C. Tests shall be performed for the following source(s) and pollutant(s):

<u>Source</u>	<u>Pollutant(s)</u>
B031	H₂S if H₂S monitor installed SO₂ if SO₂ monitor installed

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The maximum H₂S concentration in the fuel gas burned in this furnace shall not exceed 230 mg/dscm (0.10 gr/dscf) based on a rolling 3-hour period.

Monitoring of Emissions

2. Prior to installation, the owner or operator shall submit engineering diagrams that clearly represent intended monitoring locations to the Ohio EPA, Central Office for review. Intended installation locations shall be easily and safely accessible, free of cyclonic flow and provide measurements which are representative of total emissions.
3. SO₂ Continuous Emission Monitoring System (CEMS)
 - A. The owner or operator shall install, calibrate, maintain and operate an instrument for continuously monitoring and recording the concentration by volume (dry basis, zero percent excess air) of SO₂ emissions into the atmosphere (except where an H₂S monitor is installed in the following Special Term and Condition (ST&C)). The monitor shall include an oxygen monitor for correcting the data for excess air.
 - B. The span values for this monitor are 50 ppm SO₂ and 10 percent oxygen (O₂).
 - C. The SO₂ monitoring level equivalent to the H₂S standard of 230 mg/dscm (0.10 gr/dscf) shall be 20 ppm (dry basis, zero percent excess air).
 - D. The performance evaluations for this SO₂ monitor under 40 CFR 60.13 (c) shall use Performance Specification 2. Methods 6 and 3 shall be used for conducting the relative accuracy evaluations. Method 6 samples shall be taken at a flow rate of approximately 2 liters/min for at least 30 minutes. The relative accuracy limit shall be 20 percent or 4 ppm, whichever is greater, and the calibration drift

limit shall be 5 percent of the established span value.

- E. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location (i.e., after one of the combustion devices), if monitoring at this location accurately represents the SO₂ emissions into the atmosphere from each of the combustion devices.

4. H₂S Continuous Emission Monitoring System

- A. In place of the SO₂ monitor listed in the previous ST&C, the owner or operator shall install, calibrate, maintain and operate a continuous monitoring system for measurement of the H₂S content in the fuel gas before being burned in the heater.
- B. The H₂S monitoring device shall continuously monitor and record the concentration (dry basis) of H₂S in fuel gases before being burned in the furnace.
- C. The span value for this instrument is 425 mg/dscm H₂S.
- D. Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H₂S in the fuel gas being burned.
- E. The performance evaluations for this H₂S monitor under 40 CFR 60.13 (c) shall use Performance Specification 7. Method 11 shall be used for conducting the relative accuracy evaluations.

5. Performance Tests

Within 60 days after achieving the maximum rate at which this heater will be operated, but not later than 180 days after initial startup, the owner or operator shall conduct a performance specification test for the continuous emission monitor installed. Performance Specification No. 2 shall be used if an SO₂ monitor is installed, and Performance Specification No. 7 shall be performed if an H₂S monitor is installed.

The owner or operator shall submit to the Toledo Division of Environmental Services an Intent to Test (ITT) form at least thirty (30) days prior to the scheduled test date (s) to allow TESD and Ohio EPA personnel the opportunity to witness CEMS certification tests.

To be certified by Ohio EPA, the CEMS must meet the installation, measurement location, test procedure and reporting specifications as provided by the Performance Specification Test listed in ST&C's 3 or 4, and 5.

One copy of each certification test shall be submitted to the TESD and Ohio EPA, Central Office within 30 days after tests are completed.

Upon completion of certification tests, the quality assurance/quality control requirements and out-of-control criteria of 40 CFR Part 60, Appendix F shall apply.

6. Reporting and Recordkeeping

A valid hourly average shall be defined as the arithmetic mean of four or more data points equally spaced over each clock hour. Data points collected during periods of CEMS malfunctions, repairs, daily calibration checks, calibration error checks, relative accuracy tests and instruments adjustments or during CEMS out-of-control periods shall not be included in the computation of hourly averages for emission compliance purposes. During one hour periods in which required quality control or quality assurance activities are performed, a valid hourly average shall be computed using two or more data points separated by a maximum of 15 minutes.

7. The CEMS shall achieve 95% data availability. Data availability shall be determined by dividing the number of valid hours for which data are collected by the CEMS by the total number of operating hours during each calendar quarter and multiplying that figure by 100. Data availability computations shall include data collected during daily automatic calibrations, routine preventive maintenance and required quality assurance tests, but shall not include data collected during CEMS malfunctions and out-of-control periods.
8. The use of uncertified backup CEMS is acceptable to minimize monitor downtime provided the following conditions are met:
 - A. The certified CEMS is either malfunctioning or has failed quality assurance/quality control criteria;
 - B. Calibration checks are successful each day of backup CEMS operation; and
 - C. The backup CEMS is in operation a maximum of 168 hours per month.
9. The owner or operator shall submit an excess emissions and monitoring systems performance report and/or summary report form (see the following ST&C) to the TESD quarterly. All reports shall be postmarked by the 30th day following the end of each calendar quarter (January 30, April 30, July 30 and October 30).
10. Written Excess Emission reports shall include the following information:
 - A. The date, starting time and ending time of each exceedance;
 - B. The magnitude, cause and corrective action taken for each exceedance;
 - C. The total source operating time;
 - D. The total monitor downtime of the CEMS;
 - E. The total time that the source and CEMS operated together; and
 - F. The corrective action (s) taken for the source and/or CEMS malfunction.
11. The summary report form shall contain the information and be in the format show in Table 1.

- A. If the total duration of excess emission for the reporting period is less than 1 percent of the total operating time for the reporting period and CEMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the Excess Emission Report described in the following ST&C need not be submitted, unless requested.
 - B. If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CEMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report shall both be submitted.
12. The owner or operator shall maintain a file of all measurements, calibration data, maintenance, reports and any other activities involving the CEMS in a form suitable for inspection for at least five (5) years from the date of occurrence. This file shall be made available to TESD and Ohio EPA personnel during future inspections and audits.
13. Pursuant to 40 CFR Part 60, Appendix F, Section 7, the owner or operator shall submit quarterly Data Assessment Reports (DAR) to TESD documenting results of all quality assurance tests. These quarterly reports shall be submitted by January 30, April 30, July 30 and October 30 of each year with the quarterly Excess Emission Reports and/or Summary Reports and shall address the test results obtained during the pervious calendar quarter.

These quarterly reports shall contain the following information:

- A. The source owner or operator name and address;
 - B. Identification and location of monitors;
 - C. Manufacturer, model and serial number of each monitor;
 - D. Audit date;
 - E. Calibration error test procedures and cylinder numbers;
 - F. Cylinder gas concentrations and cylinder numbers;
 - G. Relative accuracy test procedures and results; and
 - H. Out-of control periods and retest results.
14. The owner or operator shall maintain records for all permanently shut down sources, included in the net contemporaneous emission increase/decrease table on the following page. Such records shall be maintained until such a time as the sources are physically removed form the facility and shall include the following information for each source; type of equipment (i.e. refinery fuel gas fired boiler), location, description, and shutdown date.