



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

11/26/03

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

03-02-02-0015
BP Chemicals, Inc.
Nanette Smith
Fort Amanda and Adgate Roads
P.O. Box 628
Lima, OH 45802-0628

Dear Nanette Smith:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 08/12/03. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Ohio EPA, Division of Air Pollution Control
Jim Orlemann, Manager, Engineering Section
Preliminary Proposed Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215**

and

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,


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

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 11/26/03

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-02-02-0015 to:
BP Chemicals, Inc.
Fort Amanda and Adgate Roads
P.O Box 628
Lima, OH 45802-0628

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B501 (Ammonia Production Unit: Boiler #1)
NG/#2 Oil Fired Boiler (227 MMBtu/hr) and
Ancillary Equipment. Refer to the overall ammonia
synthesis process description and flow diagram.

B502 (Ammonia Production Unit: Boiler #2)
NG/#2 Oil Fired Boiler (227 MMBtu/hr) and
Ancillary Equipment. Refer to the overall ammonia
synthesis process description and flow diagram.

B503 (Ammonia Production Unit: Primary Reformer
and Ancillary)
Ammonia Production Unit: NG/#2 Oil Fired Primary
Reformer And Ancillary Equipment. Refer to the
overall ammonia synthesis process description and
flow diagram.

B504 (Ammonia Unit Converter Startup Heater)
NG Indirect Fired Startup Heater (20 MMBtu/hr).
Refer to the overall ammonia synthesis process
description and flow diagram.

B506 (Ammonia Production Unit Gas Turbine)
NG Fired Gas Turbine (210 MMBtu/hr). Refer to the
overall ammonia synthesis process description and
flow diagram.

B507 (Ammonia Load Heater)
NG Indirect Fired Startup Heater (20 MMBtu/hr).
Refer to the overall ammonia synthesis process
description and flow diagram. Authorized by PTI
03-7191.

P520 (Ammonia Production Unit Reforming Section)
Ammonia Plant Reforming Section-Primary And
Secondary Reformers, Desulfurization Drums,
Primary And Secondary Shift Convertors, High
Pressure Condensate Stripper, And Ancillary
Equipment. Refer to the overall ammonia synthesis
process description and flow diagram.

P521 (Ammonia Production Unit Purification Section
)
Ammonia Plant Purification Section - Condensate
Separators, CO2 Absorber, Absorber KO, Methanator
and Ancillary Equipment. Refer to the overall
ammonia synthesis process description and flow
diagram.

P522 (Ammonia Production Unit Synthesis Section)
Ammonia Plant Synthesis Section: Methanator
Knockout, Synthesis Gas Compressor, Ammonia
Converter, Ammonia Separator, Refrigeration
Compressor, and Ancillary Equipment. Refer to the
overall ammonia synthesis process description and
flow diagram.

P523 (Ammonia Production Unit CO2 Stripper
Section)
Ammonia Plant Condensate Purification Section:
CO2 Stripper, Deaerator, and Ancillary Equipment.
Refer to the overall ammonia synthesis process
description and flow diagram.

P524 (Urea Prilling Dryer Cyclone)
Urea Plant Prilling Section - Crystal Drying,
Conveying, Melting And Associated Equipment.
Refer to the overall ammonia synthesis process
description and flow diagram.

P525 (Urea Prilling Mother Liquor System)
Urea Plant Prilling Section - Crystallizer/Mother
Liquor Tank And Ancillary Equipment. Refer to the
overall ammonia synthesis process description and
flow diagram.

P526 (Urea Plant Synthesis Section)
Urea Plant Synthesis Section including Urea Reactor
(PR 76-0372), High Pressure Decomposer, and
Product Concentrator. Refer to the overall ammonia
synthesis process description and flow diagram.

P527 (Urea Dissolving Tank)
Urea Plant Prilling Section - Lump Dissolving
System. Refer to the overall ammonia synthesis
process description and flow diagram.

P528 (Urea Crystallizer Section)
Urea Plant Prilling Section - Crystallizer And
Associated Equipment. Refer to the overall Urea
Prilling Section process description and flow diagram.

P529 (Urea Plant Concentrator Section)
Urea Plant Concentrator Section - Concentrator, And
Associated Equipment. Refer to the overall Urea
Synthesis Section process description and flow
diagram.

P531 (Ammonium Nitrate Neutralizer System)
450 Ton/Day Ammonium Nitrate Plant With Vent
Scrubbers Also Provides Emission Controls For
Source T017. Refer to the overall Ammonium Nitrate
Plant process description and flow diagram.

P532 (Nitric Acid Tanks (T-31, 32, 33))
Nitric Acid and Ammonium Nitrate Blending and
Storage: North & South Acid Blend Tanks and
Storage Tank in Nitric Acid Plant - P.R. 4075, 4025,
and 4050.

P536 (West Urea Warehouse Operations)
West Urea Warehouse - Warehouse, Bagging, And
Bulk Loading Operations For Prilled Urea. Refer to

overall Urea Prilling process description and flow
diagram.

P545 (East Urea Warehouse Bagging)
East Urea Warehouse - Warehouse, Bagging, and
Bulk Loading Operations for Granular Urea. Refer to
the overall Urea Granulation process description and
flow diagram. Authorized by PTI #03-968.

P546 (Granulation Plant Scrubber)
Urea Granulation Plant - Granulation Section,
Granulator Drum, and associated equipment. Refer to
the overall Urea Granulation process description and
flow diagram. Authorized by PTI #03-968.

P547 (Granulator Plant Evaporator)
Urea Granulation Plant Section - Evaporator and
associated equipment. Refer to the overall Urea
Granulation process description and flow diagram.
Authorized by PTI #03-968.

P553 (HPD Ammonium Nitrate Evaporator)
HPD Ammonium Nitrate Evaporator associated with
the Chem Seps Unit in Blending, Shipping and
Storage - P.R. 5104

P554 (Anhydrous Ammonia Truck Loading)
Closed Loading System. Only Emissions During
Disconnecting Operation. Vapor Emissions
Controlled By Refrigerated Vapor Liquefaction
System And Return to Storage. Inerts Vented
Through Flame System. Refer to overall Blending
and Shipping process description and flow diagram.

P555 (Anhydrous Ammonia Railcar Loading)
Closed Loading System. Only Emissions During
Disconnecting Operations. Vapor Emissions
Controlled By Refrigerated Vapor Liquefaction
System And Return to Storage. Inerts Vented
Through Flame System. Refer to overall Blending
and Shipping process description and flow diagram.

P556 (Aqua Truck Loading)
Aqua Truck Loading in Blending, Shipping and
Storage. Refer to overall Blending and Shipping
process description and flow diagram.

P557 (Urea Water Truck Loading)
Urea Water Truck Loading in Blending, Shipping, and
Storage. Refer to overall Blending and Shipping
process description and flow diagram.

P558 (Ammonium Nitrate Truck Loading)
Ammonium Nitrate Truck Loading in Blending,
Shipping and Storage. Refer to overall Blending and
Shipping process description and flow diagram.

P559 (Fertilizer Solutions Loading)
Fertilizer Solutions Loading in Blending, Shipping and Storage. Refer to overall Blending and Shipping process description and flow diagram.

P560 (Urea Plant Prill Tower)
Urea Plant Prilling Section - Prill Tower, Wet Scrubber System, And Associated Equipment. Refer to overall Urea Prilling process description and flow diagram.

P563 (Urea Reactor Feed Section)
Urea Plant Synthesis Section - Reactor Feed Section incl. NH3 feed pump PR 70-7434. Refer to overall Urea Synthesis process description and flow diagram.

P564 (UTI Hotwell Section)
Urea Plant Synthesis Section - Condensate Collection Section. Refer to overall Urea Synthesis process description and flow diagram. Authorized by PTI #03-968.

P570 (#2 Nitric Acid Plant)
#2 Nitric Acid Plant - 400 ton/day nitric acid plant with extended absorption and catalytic NOx reduction. Refer to overall Nitric Acid Plant process description and flow diagram.

P571 (#1 Cooling Tower Nitric Acid Unit)
#1 Cooling Tower Nitric Acid Unit

P572 (#2 Cooling Tower Ammonia Unit)
#2 Cooling Tower Ammonia Unit

T560 (Urea Formadehyde Storage Tank (UF-85))
T-62, 27,500 Gallon Fixed Roof Urea Formaldehyde Storage Tank & Ancillary Equipment At The Granulation Plant. Authorized by PTI #03-968.

T589 (Methanol Tank)
2,300 Gallon Fixed Roof Methanol Storage Tank at Water Treatment - P.R. 76-4068

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

5. 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.

6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. [OAC rule 3745-21-09(DD)] Leaks from Process Units that Produce Organic Chemicals

The following emissions units are subject to this rule: P525, P526, P527, P528, P529, P546, P547, P560, P563, T560 and T589.

(1) Except where exempted under paragraph (DD)(17) of this rule, each owner or operator of a process unit that produces as an intermediate or final product one or more of the organic chemicals identified in appendix A of this rule shall comply with the requirements in paragraphs (DD)(2) to (DD)(6) of this rule no later than the date specified in paragraph (C)(38) of rule 3745-21-04 of the Administrative Code.

(2) Leak detection and repair program.

(a) A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the requirements specified in paragraphs (DD)(2)(b) to (DD)(2)(m) of this rule.

(b) Except as otherwise provided in paragraphs (DD)(2)(c) and (DD)(2)(d) of this rule, equipment shall be monitored for leaks in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code, as follows:

(i) Any pump in light liquid service shall be monitored monthly.

(ii) Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed anytime after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

(iii) Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:

(a) Any pump in heavy liquid service;

(b) Any valve in heavy liquid service;

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(c) Any pressure relief device in light liquid service or in heavy liquid service; and

(d) Any flange or other connector.

(iv) Any equipment in which a leak is detected as described in paragraph (DD)(2)(g) of this rule shall be monitored within five working days after each attempt to repair, unless the owner or operator believes that the equipment was not successfully repaired.

(c) For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in paragraph (DD)(2)(b)(ii) of this rule as follows:

(i) The valve is designated as difficult to monitor and is monitored each calendar year, provided the following conditions are met:

(a) Construction of the process unit commenced prior to May 9, 1986.

(b) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than six feet above a support surface.

(c) The owner or operator of the valve has a written plan that requires monitoring of the valve at least once per year.

(ii) The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:

(a) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis.

(b) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.

(iii) The valve is subject to an alternative monitoring schedule based on a skip period as specified in paragraph (DD)(12) of this rule.

(d) Excluded from the monitoring requirements of paragraph (DD)(2)(b) of this rule are the following equipment:

(i) Any pump that has no externally actuated shaft penetrating the pump housing and that is designated for no detectable emissions as provided in paragraph (DD)(7) of this rule;

(ii) Any pump that is equipped with a dual mechanical seal which has a barrier fluid system and sensor that comply with the requirements specified in paragraph (DD)(8) of this rule;

(iii) Any pump that is equipped with a closed vent system capable of capturing and transporting any leakage from the pump seal to control equipment, provided the closed vent system and the control equipment comply with the requirements specified in paragraphs (DD)(9) and (DD)(10) of this rule;

(iv) Any valve that has no externally actuated stem penetrating the valve and that is designated for no detectable emissions as provided in paragraph (DD)(7) of this rule; and

(v) Any valve that is subject to the alternative monitoring standard for valves based on the percentage of valves leaking as provided in paragraph (DD)(13) of this rule.

(e) Any pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal, unless the pump is equipped with a closed vent system capable of transporting any leakage from the pump seal to control equipment, and the closed vent system and control equipment comply with the requirements specified in paragraphs (DD)(9) and (DD)(10) of this rule.

(f) Any sensor employed pursuant to paragraph (DD)(2)(d)(ii) or (DD)(3)(b) of this rule shall be checked daily, unless the sensor is equipped with an audible alarm.

(g) A leak is detected:

(i) When a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method in paragraph (F) of rule 3745-21-10 of the Administrative Code;

(ii) When there is an indication of liquids dripping from the seal of a pump in light liquid service; or

(iii) When a sensor employed pursuant to paragraph (DD)(2)(d)(ii) or (DD)(3)(b) of this rule indicates failure of the seal system, the barrier fluid system, or both.

(h) When a leak is detected as described in paragraph (DD)(2)(g) of this rule, the following procedures shall be followed:

(i) A weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment.

(ii) A record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to paragraph (DD)(2)(k) of this rule.

(iii) The identification tag attached to the leaking equipment, other than a valve that is monitored pursuant to paragraph (DD)(2)(b)(ii) of this rule, may be removed after the leaking equipment is repaired.

(iv) The identification tag attached to a leaking valve that is monitored pursuant to paragraph (DD)(2)(b)(ii) of this rule may be removed after the leaking valve is repaired, monitored for leaks for two consecutive months as specified in paragraph (DD)(2)(b)(ii) of this rule, and found to have no detected leaks during those two consecutive months.

(i) When a leak is detected as described in paragraph (DD)(2)(g) of this rule, the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in paragraph (DD)(11) of this rule. Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to paragraph (DD)(2)(b)(iv) of this rule is less than ten thousand ppmv.

(j) When a leak is detected as described in paragraph (DD)(2)(g) of this rule, a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall 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.

(k) When a leak is detected as described in paragraph (DD)(2)(g) of this rule, the following information shall be recorded in a leak repair log:

- (i) The identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;
- (ii) The basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;
- (iii) The date on which the leak was detected and the date of each attempt to repair the leaking equipment;

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(iv) The methods of repair applied in each attempt to repair the leaking equipment;

(v) One of the following entries within five working days after each attempt to repair the leaking equipment:

(a) "Not monitored," denoting the leaking equipment was presumed to still be leaking and it was not monitored; or

(b) If the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:

(i) The actual reading in ppmv; or

(ii) "Below 10,000," denoting less than ten thousand ppmv; or

(iii) "Above 10,000," denoting not less than ten thousand ppmv;

(vi) If the leak is not repaired within fifteen calendar days after the date on which it was detected:

(a) "Repair delayed" and the reason for the delay;

(b) If repair is being delayed until the next process unit shutdown due to technical infeasibility of repair, the signature of the owner or operator whose decision it was that repair is technically infeasible without a process unit shutdown;

(c) The expected date of successful repair of the leak;

(d) The dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and

(vii) The date on which the leak was successfully repaired.

(l) The leak repair log shall be retained by the owner or operator of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.

(m) Semiannual reports shall be submitted to the director by the first day of February and August and shall include the following information for the preceding semiannual periods:

(i) The process unit identification;

(ii) The number of pumps in light liquid service excluding those pumps designated for no detectable emissions under the provision of paragraph

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(DD)(2)(d)(i) of this rule and those pumps complying with paragraph (DD)(2)(d)(iii) of this rule;

(iii) The number of valves in gas/vapor service or in light liquid service excluding those valves designated for no detectable emission under the provision of paragraph (DD)(2)(d)(iv) of this rule and those valves subject to the alternative standard for monitoring under the provision of paragraph (DD)(2)(d)(v) of this rule;

(iv) The number of compressors excluding those compressors designated for no detectable emissions under the provision of paragraph (DD)(3)(c) of this rule and those compressors complying with paragraph (DD)(3)(d) or (DD)(3)(e) of this rule;

(v) For each month during the semiannual period:

(a) The number of pumps in light liquid service for which leaks were detected as described in paragraph (DD)(2)(g) of this rule;

(b) The number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

(c) The number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in paragraph (DD)(2)(g) of this rule;

(d) The number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

(e) The number of compressors for which leaks were detected as described in paragraph (DD) of this rule;

(f) The number of compressors for which leaks were not repaired within fifteen calendar days after the date of leak detection; and

(g) The facts that explain each delay of repair allowed pursuant to paragraph (DD)(11) of this rule; and

(vi) The dates of process unit shutdowns that occurred within the semiannual period.

(3) Compressors.

(a) Except as otherwise provided in paragraphs (DD)(3)(c) to (DD)(3)(e) of this rule, any compressor in the process unit shall comply with the requirements specified in paragraph (DD)(3)(b) of this rule.

(b) The compressor shall be equipped with a seal that has a barrier fluid system and sensor which comply with the requirements specified in paragraph (DD)(8) of this rule.

(c) Excluded from the requirements of paragraph (DD)(3)(b) of this rule is any compressor that is designated for no detectable emissions as provided in paragraph (DD)(7) of this rule.

(d) Excluded from the requirements of paragraph (DD)(3)(b) of this rule is any compressor that is equipped with a closed vent system capable of capturing and transporting any leakage from the compressor seal to control equipment, provided the closed vent system and the control equipment comply with the requirements specified in paragraphs (DD)(9) and (DD)(10) of this rule.

(e) Excluded from the requirements of paragraph (DD)(3)(b) of this rule is any reciprocating compressor that meets the following conditions:

(i) The compressor was installed prior to May 9, 1986; and

(ii) The owner or operator of the compressor demonstrates to the satisfaction of the director that recasting the compressor distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the requirements of paragraph (DD)(3)(b) of this rule.

(4) Pressure relief devices in gas/vapor service.

(a) Except as otherwise provided in paragraph (DD)(4)(e) of this rule, any pressure relief device in gas/vapor service in the process unit shall comply with the requirements specified in paragraphs (DD)(4)(b) to (DD)(4)(d) of this rule.

(b) Except during pressure releases, the pressure relief device shall be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

(c) No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

(d) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in paragraph (DD)(11) of this rule.

(e) Excluded from the requirements of paragraphs (DD)(4)(b) to (DD)(4)(d) of this rule is any pressure relief device that is equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to control equipment, provided the closed vent system and control equipment comply with the requirements specified in paragraphs (DD)(9) and (DD)(10) of this rule.

(5) Sampling connection system.

(a) Except as otherwise provided in paragraph (DD)(5)(c) of this rule, any sampling connection system in the process unit shall comply with the requirements specified in paragraph (DD)(5)(b) of this rule.

(b) The sampling connection system shall be equipped with a closed purge system or a closed vent system that meets one of the following requirements:

(i) The purged process fluid is returned directly to the process line with zero VOC emissions to the ambient air;

(ii) The purged process fluid is collected and recycled with zero VOC emissions to the ambient air; or

(iii) The closed purge system or closed vent system is designed and operated to capture and transport all the purged process fluid to control equipment that meet the requirements specified in paragraph (DD)(10) of this rule.

(c) Excluded from the requirements of paragraph (DD)(5)(b) of this rule is any sampling connection system that is an in-situ sampling system.

(6) Open-ended valves or lines.

(a) Any open-ended valve or line in the process unit shall be equipped with a cap, blind flange, plug, or second valve and shall comply with the requirements specified in paragraphs (DD)(6)(b) to (DD)(6)(d) of this rule.

(b) Except during operations requiring the flow of process fluid through the open-ended valve or line, the cap, blind flange, plug, or second valve shall seal the open end of the open-ended valve or line.

(c) If equipped with a second valve, the open-ended valve or line shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

(d) If a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall comply with paragraph (DD)(6)(b) of this rule at all other times.

(7) Equipment designated for no detectable emissions.

(a) Any equipment (pump, valve, or compressor) designated for no detectable emissions pursuant to paragraph (DD)(2)(d)(I), (DD)(2)(d)(iv) or (DD)(3)(c) of this rule shall comply with the requirements specified in paragraphs (DD)(7)(b) to (DD)(7)(d) of this rule.

(b) The equipment shall be operated with no detectable emissions as indicated by an instrument reading of less than five hundred ppmv above background as measured by paragraph (F) of rule 3745-21-10 of the Administrative Code.

(c) The equipment shall be tested for compliance with paragraph (DD)(7)(b) of this rule initially upon designation and annually.

(d) The designation of the equipment shall be signed by the owner or operator of the equipment in the log kept pursuant to paragraph (DD)(14)(b) of this rule.

(8) Barrier fluid systems and sensors for pumps and compressors.

(a) When a pump or compressor is equipped with a seal that has a barrier fluid system and sensor which are employed to meet the requirements of paragraph (DD)(2)(d)(ii) or (DD)(3)(a) of this rule, the requirements of paragraphs (DD)(8)(b) to (DD)(8)(d) of this rule shall be met.

(b) The barrier fluid system shall meet one of the following conditions:

(i) The barrier fluid system is operated with a barrier fluid at a pressure that is at all times greater than the stuffing box pressure of the pump or compressor.

(ii) The barrier fluid system is equipped with a barrier fluid degassing reservoir that is connected by a closed vent system to control equipment and the closed vent system and control equipment comply with the requirements specified in paragraphs (DD)(9) and (DD)(10) of this rule.

(iii) The barrier fluid system is equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the ambient air.

(c) The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.

(d) The barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both based on criteria determined by the owner or operator from design considerations and operating experience.

(9) Closed vent systems.

(a) Any closed vent system that is used to comply with the requirements of paragraph (DD)(2)(d)(iii), (DD)(3)(d), (DD)(4)(e), or (DD)(8)(b)(ii) of this rule shall comply with the requirements specified in paragraphs (DD)(9)(b) to (DD)(9)(d) of this rule.

(b) The closed vent system shall be designed and operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

(c) The closed vent system shall be tested for compliance with paragraph (DD)(9)(b) of this rule initially and annually.

(d) The closed vent system shall be operated at all times when emissions may be vented to it.

(10) Control equipment.

(a) Any control equipment that is used to comply with the requirements of paragraph (DD)(2)(d)(iii), (DD)(3)(d), (DD)(4)(e), (DD)(5)(b)(iii), (DD)(8)(b)(ii), or (DD)(11)(d)(ii) of this rule shall comply with the requirements specified in paragraphs (DD)(10)(b) to (DD)(10)(f) of this rule.

(b) If the control equipment is a vapor recovery system, it shall be designed and operated to recover VOC emissions vented to it with an efficiency of at least ninety-five per cent by weight.

(c) If the control equipment is an enclosed combustion device, it shall be designed and operated to reduce the VOC emissions vented to it with an efficiency of at least ninety-five per cent by weight, or to provide a minimum residence time of 0.75 second at a minimum temperature of fifteen hundred degrees Fahrenheit.

(d) If the control equipment is a flare, it shall meet the following requirements:

(i) The flare shall be designed for and operated with no visible emissions as determined by "Method 22, 40 CFR, Part 60, Appendix A," except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.

(ii) The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame. If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

(iii) The flare shall be steam-assisted, air-assisted or nonassisted.

(iv) The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be three hundred Btu/scf or greater if the flare is steam-assisted or air-assisted, or shall be two hundred Btu/scf or greater if the flare is nonassisted.

(v) Except as provided in paragraph (DD)(10)(d)(vi) of this rule, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than sixty feet per second if the flare is steam-assisted or nonassisted, or less than the maximum permitted velocity, as determined in paragraph (P)(4) of rule 3745-21-10 of the Administrative Code, if the flare is air-assisted.

(vi) Excluded from the requirements of paragraph (DD)(10)(d)(v) of this rule is any steam-assisted or nonassisted flare that meets both of the following requirements:

(a) The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.

(b) The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.

(e) The owner or operator of the control equipment shall monitor the control equipment to ensure that it is operated and maintained in conformance with its design.

(f) The control equipment shall be operated at all times when emissions may be vented to it.

(11) Delay of repair.

(a) A delay of repair that is employed pursuant to paragraph (DD)(2)(I) or (DD)(4)(d) of this rule shall be allowed only as provided in paragraphs (DD)(11)(b) to (DD)(11)(f) of this rule.

(b) A delay of repair shall be allowed if the repair is technically infeasible without a process unit shutdown. However, the repair shall occur before the end of the next process unit shutdown.

(c) A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).

(d) A delay of repair for a valve shall be allowed if:

- (i) The owner or operator of the valve demonstrates that the emission of purged material resulting from immediate repair is greater than the emission likely to result from delay of repair; and
- (ii) When repair procedures are effected, the purged material is collected and destroyed or recovered in control equipment that meets the requirements specified in paragraph (DD)(10) of this rule.

(e) A delay of repair for a pump shall be allowed if:

- (i) The repair requires the use of a dual mechanical seal system and associated barrier fluid system; and
- (ii) The repair is completed as soon as practicable, but no later than six months after the leak was detected.

(f) A delay of repair beyond a process unit shutdown shall be allowed for a valve if a 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. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.

(12) Alternative monitoring schedule for valves based on a skip period.

(a) Any owner or operator of a process unit may elect to implement an alternative monitoring schedule in lieu of the monitoring requirements specified in paragraph (DD)(2)(b)(ii) of this rule, as provided in paragraph (DD)(2)(c)(iii) of this rule. The alternative monitoring schedule shall be based on skipping quarterly monitoring periods provided the percentage of valves leaking is no more than 2.0. Any owner or operator who elects to implement an alternative monitoring schedule shall comply with the requirements specified in paragraphs (DD)(12)(b) to (DD)(12)(h) of this rule.

(b) The owner or operator must notify the director prior to implementing this alternative monitoring schedule. Such notification must identify which valves will be subject to this alternative monitoring schedule and which work practice within paragraph (DD)(12)(e) of this rule will be implemented. Any valve in vacuum service, in heavy liquid service, or not in VOC service, shall be excluded from this alternative monitoring schedule.

(c) Any valve subject to this alternative monitoring schedule shall comply initially with the monitoring requirements specified in paragraph (DD)(2)(b)(ii) of this rule.

(d) Any valve subject to this alternative monitoring schedule shall continue to be subject to the requirements specified in paragraphs (DD)(2)(g) to (DD)(2)(m) of this rule.

(e) One of the following two alternative work practices for skipping monitoring periods may be implemented:

(i) After two consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, a monitoring program may begin in which the first quarter of every two consecutive quarterly leak detection periods is skipped.

(ii) After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, a monitoring program may begin in which the first three quarters of every four consecutive quarterly periods is skipped.

(f) If the percentage of valves leaking is greater than 2.0, the owner or operator shall comply with the monitoring requirements as specified in paragraph (DD)(2)(b)(ii) of this rule, but may again elect to use this alternative monitoring schedule.

(g) The percentage of valves leaking shall be determined for the valves subject to this alternative monitoring schedule as the sum of the number of those valves found leaking during any portion of the current monitoring period and the number of those valves found leaking during a previous monitoring period for which repair has been delayed during the current monitoring period, divided by the total number of valves, and multiplied by one hundred.

(h) The following information pertaining to valves subject to this alternative monitoring schedule shall be recorded in a log that is kept in a readily accessible location:

(i) A schedule of monitoring; and

(ii) The percentage of valves leaking during each monitoring period.

(13) Alternative monitoring standard for valves based on the allowable percentage of valves leaking.

(a) Any owner or operator of a process unit may elect to implement an alternative monitoring standard in lieu of the monitoring requirements specified in paragraph (DD)(2)(b)(ii) of this rule, as provided in paragraph (DD)(2)(d)(v) of this rule. The alternative monitoring standard shall be based on maintaining the percentage of valves leaking at 2.0 or less. Any owner or operator who elects to implement an alternative monitoring standard shall comply with the requirements specified in paragraphs (DD)(13)(b) to (DD)(13)(g) of this rule.

(b) The owner or operator must notify the director prior to implementing this alternative monitoring standard.

(c) All valves in gas/vapor service or in light liquid service in the process unit shall be subject to this alternative monitoring standard, except for those valves which are

designated as unsafe to monitor as provided in paragraph (DD)(2)(c)(ii) of this rule, those valves not in VOC service, and those valves in vacuum service.

(d) The percentage of valves leaking, as determined in accordance with paragraph (DD)(13)(f) of this rule, shall not exceed 2.0. If the percentage of valves leaking is greater than 2.0, the owner or operator shall comply with the monitoring requirements as specified in paragraph (DD)(2)(b)(ii) of this rule, but may again elect to use this alternative monitoring standard.

(e) All valves subject to this alternative monitoring standard shall be tested for compliance with paragraph (DD)(13)(d) of this rule initially upon implementation and annually.

(f) A compliance test shall be conducted in the following manner:

(i) All valves subject to this alternative monitoring standard shall be monitored for leaks within a one-week period by the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

(ii) If an instrument reading of ten thousand ppmv or greater is measured, a leak is detected.

(iii) The percentage of valves leaking shall be determined as the number of valves for which a leak is detected, divided by the number of valves monitored, and multiplied by one hundred.

(g) When a leak is detected as described in paragraph (DD)(13)(f)(ii) of this rule, the leaking valve shall be repaired in accordance with paragraphs (DD)(2)(h) and (DD)(2)(i) of this rule.

(14) Record Keeping.

(a) Each owner or operator of a process unit as described in paragraph (DD)(1) of this rule shall comply with the recordkeeping requirements of paragraphs (DD)(14)(b) to (DD)(14)(g) of this rule. An owner or operator of more than one process unit may use one recordkeeping system to comply with the recordkeeping requirements, provided the system identifies each record by each process unit.

(b) The following information shall be recorded in a log that is kept in a readily accessible location:

(i) A list of identification numbers for equipment subject to the requirements of paragraphs (DD)(2) to (DD)(10) of this rule;

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(ii) A list of identification numbers for equipment designated for no detectable emissions as provided in paragraph (DD)(7) of this rule, and a signature of the owner or operator authorizing such designation;

(iii) A list of identification numbers for pressure relief devices subject to paragraph (DD)(4) of this rule;

(iv) A list of identification numbers for closed vent systems subject to paragraph (DD)(9) of this rule; and

(v) For compliance tests required under paragraphs (DD)(4)(c), (DD)(7)(c), and (DD)(9)(c) of this rule:

(a) The date of each compliance test;

(b) The background level measured during each compliance test; and

(c) The maximum instrument reading measured at the equipment during each compliance test.

(c) The following information pertaining to valves subject to an alternative monitoring schedule, as provided in paragraph (DD)(2)(c) of this rule, shall be recorded in a log that is kept in a readily accessible location:

(i) A list of identification numbers for valves 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;

(ii) A list of identification numbers for valves 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; and

(iii) A list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.

(d) The following information pertaining to closed vent systems and control equipment described in paragraphs (DD)(9) and (DD)(10) of this rule shall be recorded and kept in a readily accessible location:

(i) Detailed schematics, design specifications, and piping and instrumentation diagrams;

(ii) The dates and descriptions of any changes in the design specifications;

(iii) A description of the parameter or parameters monitored, as required in paragraph (DD)(10)(d) of this rule, to ensure that the control equipment is operated and maintained in conformance with its design, and an explanation of the reason for selecting such parameter or parameters;

(iv) Periods when the closed vent systems and control equipment are not operated as designed, including periods when a flare pilot light does not have a flame; and

(v) Dates of startups and shutdowns of the closed vent systems and control equipment.

(e) The following information pertaining to barrier fluid systems and sensors described in paragraph (DD)(8) of this rule shall be recorded in a log that is kept in a readily accessible location:

(i) A list of identification numbers of pumps and compressors equipped with such barrier fluid systems and sensors;

(ii) The criteria that indicate failure of the seal system, the barrier fluid system, or both, as required in paragraph (DD)(8)(d) of this rule and an explanation of the criteria; and

(iii) Any changes to such criteria and the reasons for the changes.

(f) The following information for use in determining an exemption for the process unit as provided in paragraph (DD)(17)(a) of this rule shall be recorded in a log that is kept in a readily accessible location:

(i) An analysis demonstrating the design capacity of the process unit;

(ii) A statement listing the feed and raw materials and products from the process unit and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohols; or

(iii) An analysis demonstrating that no equipment is in VOC service.

(g) The following information pertaining to specific equipment that are exempt as provided in paragraph (DD)(17)(b) of this rule shall be recorded in a log that is kept in a readily accessible location:

(i) A list of identification numbers of equipment in vacuum service;

(ii) A list of identification numbers of equipment not in VOC service and the information or data used to demonstrate that the equipment is not in VOC service; and]

(iii) A list of equipment subject to an equivalent emission requirement that is approved by the director pursuant to paragraph (DD)(16) of this rule.

(15) Reporting.

(a) Each owner or operator of a process unit as described in paragraph (DD)(1) of this rule shall comply with the reporting requirements specified in paragraphs (DD)(15)(b) to (DD)(15)(d) of this rule.

(b) For compliance tests required under paragraphs (DD)(7)(c) and (DD)(9)(c) of this rule, the requirements of paragraphs (A)(3) and (A)(4) of rule 3745-21-10 of the Administrative Code (pertaining to notification of intent to test) shall be met. The results of such compliance tests shall be reported to the Ohio environmental protection agency district office or delegate agency within thirty days after the test date.

(c) The results of compliance tests required under paragraph (DD)(4)(c) of this rule shall be reported semiannually to the Ohio environmental protection agency district office or delegate agency. The semiannual reports shall be submitted by the first day of February and August and shall include information for the preceding semiannual period.

(d) Any semiannual reports required under paragraph (DD)(2)(m) of this rule may be sent to the Ohio environmental protection agency district office or delegate agency.

(16) Equivalent requirement.

(a) Any owner or operator of a process unit may apply to the director for determination of an equivalent requirement in lieu of the requirements specified in paragraphs (DD)(2) to (DD)(10) of this rule. The determination of equivalence will be evaluated by the guidelines specified in paragraphs (DD)(16)(b) to (DD)(16)(d) of this rule. If the director approves an equivalent requirement for a process unit, said requirement shall be specified in the special terms and conditions of the permit to operate or variance issued by the director for the process unit.

(b) The owner or operator applying for a determination of equivalency shall be responsible for collecting and verifying test data to demonstrate the proposed equivalence.

(c) The equivalent requirement shall achieve a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC that would be achieved by compliance with the applicable requirements of paragraph (DD) of this rule.

(d) The director may condition the approval of equivalence as necessary to ensure the same emission reduction as the applicable requirements of paragraph (DD) of this rule.

(17) Exemptions.

(a) Exempted from the requirements of paragraphs (DD)(2) to (DD)(6) of this rule are the following process units:

(i) Any process unit that has a design capacity to produce less than one thousand one hundred tons per year;

(ii) Any process unit that produces only heavy liquid chemicals from heavy liquid feed or raw materials;

(iii) Any process unit that produces beverage alcohol;

(iv) Any process unit that has no equipment in VOC service as determined in accordance with paragraph (O)(2) of rule 3745-21-10 of the Administrative Code; and

(v) Any process unit at a petroleum refinery, as defined in paragraph (E)(15) of rule 3745-21-01 of the Administrative Code.

(b) Exempted from the requirements of paragraphs (DD)(2) to (DD)(6) of this rule are the following equipment:

(i) Any equipment not in VOC service, as determined in accordance with paragraph (O)(2) of rule 3745-21-10 of the Administrative Code;

(ii) Any equipment in vacuum service; and

(iii) Any equipment subject to an equivalent emission limitation as provided in paragraph (DD)(16) of this rule.

2. [40 CFR 60, Subpart VV] Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry

The following emissions units are subject to this rule: P546, P547, T560 and T589.

§§ 60.482-1 Standards: General.

(a) Each owner or operator subject to the provisions of this subpart shall demonstrate compliance with the requirements of §§§§ 60.482-1 through 60.482-10 or §§ 60.480(e) for all equipment within 180 days of initial startup.

(b) Compliance with §§§§ 60.482-1 to 60.482-10 will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in §§ 60.485.

(c)(1) An owner or operator may request a determination of equivalence of a means of emission limitation to the requirements of §§§§ 60.482-2, 60.482-3, 60.482-5, 60.482-6, 60.482-7, 60.482-8, and 60.482-10 as provided in §§ 60.484.

(2) If the Administrator makes a determination that a means of emission limitation is at least equivalent to the requirements of §§§§ 60.482-2, 60.482-3, 60.482-5, 60.482-6, 60.482-7, 60.482-8, or 60.482-10, an owner or operator shall comply with the requirements of that determination.

(d) Equipment that is in vacuum service is excluded from the requirements of §§§§ 60.482-2 to 60.482-10 if it is identified as required in §§ 60.486(e)(5).

§§ 60.482-2 Standards: Pumps in light liquid service.

(a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in §§60.485(b), except as provided in §§ 60.482-1(c) and paragraphs (d), (e), and (f) of this section.

(2) Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

(b)(1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(2) If there are indications of liquids dripping from the pump seal, a leak is detected.

(c)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §§ 60.482-9.

(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(d) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of paragraph (a), *Provided* the following requirements are met:

(1) Each dual mechanical seal system is --

(i) Operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or

(ii) Equipment with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of §§ 60.482-10; or

(iii) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

(2) The barrier fluid system is in heavy liquid service or is not in VOC service.

- (3) Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
- (4) Each pump is checked by visual inspection, each calendar week, for indications of liquids dripping from the pump seals.
- (5)(i) Each sensor as described in paragraph (d)(3) is checked daily or is equipped with an audible alarm, and
- (ii) The owner or operator determines, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
- (6)(i) If there are indications of liquids dripping from the pump seal or the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in paragraph (d)(5)(ii), a leak is detected.
- (ii) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §§ 60.482-9.
- (iii) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (e) Any pump that is designated, as described in §§ 60.486(e)(1) and (2), for no detectable emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraphs (a), (c), and (d) of this section if the pump:
- (1) Has no externally actuated shaft penetrating the pump housing,
- (2) Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as measured by the methods specified in §§ 60.485(c), and
- (3) Is tested for compliance with paragraph (e)(2) of this section initially upon designation, annually, and at other times requested by the Administrator.
- (f) If any pump is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a process or to a fuel gas system or to a control device that complies with the requirements of §§ 60.482-10, it is exempt from paragraphs (a) through (e) of this section.
- (g) Any pump that is designated, as described in §§ 60.486(f)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of paragraphs (a) and (d)(4) through (6) of this section if:
- (1) The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with paragraph (a) of this section; and
- (2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic

monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in paragraph (c) of this section if a leak is detected.

(h) Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of paragraphs (a)(2) and (d)(4) of this section, and the daily requirements of paragraph (d)(5) of this section, provided that each pump is visually inspected as often as practicable and at least monthly.

§§ 60.482-3 Standards: Compressors.

(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in §§ 60.482-1(c) and paragraph (h) and (i) of this section.

(b) Each compressor seal system as required in paragraph (a) shall be:

(1) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or

(2) Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of §§ 60.482-10; or

(3) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

(c) The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.

(d) Each barrier fluid system as described in paragraph (a) shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.

(e)(1) Each sensor as required in paragraph (d) shall be checked daily or shall be equipped with an audible alarm.

(2) The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.

(f) If the sensor indicates failure of the seal system, the barrier system, or both based on the criterion determined under paragraph (e)(2), a leak is detected.

(g)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §§ 60.482-9.

(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(h) A compressor is exempt from the requirements of paragraphs (a) and (b) of this section, if it is equipped with a closed vent system to capture and transport leakage from the compressor

drive shaft back to a process or fuel gas system or to a control device that complies with the requirements of §§ 60.482-10, except as provided in paragraph (i) of this section.

(i) Any compressor that is designated, as described in §§ 60.486(e) (1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraphs (a)-(h) if the compressor:

(1) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the methods specified in §§ 60.485(c); and

(2) Is tested for compliance with paragraph (i)(1) of this section initially upon designation, annually, and at other times requested by the Administrator.

(j) Any existing reciprocating compressor in a process unit which becomes an affected facility under provisions of §§ 60.14 or §§ 60.15 is exempt from §§ 60.482(a), (b), (c), (d), (e), and (h), provided the owner or operator demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of paragraphs (a) through (e) and (h) of this section.

§§ 60.482-4 Standards: Pressure relief devices in gas/vapor service.

(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in §§ 60.485(c).

(b)(1) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in §§ 60.482-9.

(2) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in §§ 60.485(c).

(c) Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in §§ 60.482-10 is exempted from the requirements of paragraphs (a) and (b) of this section.

(d)(1) Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of paragraphs (a) and (b) of this section, provided the owner or operator complies with the requirements in paragraph (d)(2) of this section.

(2) After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in §§ 60.482-9.

§§ 60.482-5 Standards: Sampling connection systems.

(a) Each sampling connection system shall be equipped with a closed-purged, closed-loop, or closed-vent system, except as provided in §§ 60.482-1(c). Gases displaced during filling of the sample container are not required to be collected or captured.

(b) Each closed-purge, closed-loop, or closed-vent system as required in paragraph (a) of this section shall comply with the requirements specified in paragraphs (b)(1) through (4) of this section:

(1) Return the purged process fluid directly to the process line; or

(2) Collect and recycle the purged process fluid to a process; or

(3) Be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of §§ 60.482-10; or

(4) Collect, store, and transport the purged process fluid to any of the following systems or facilities:

(i) A waste management unit as defined in 40 CFR 63.111, if the waste management unit is subject to, and operated in compliance with the provisions of 40 CFR part 63, subpart G, applicable to Group 1 wastewater streams;

(ii) A treatment, storage, or disposal facility subject to regulation under 40 CFR part 262, 264, 265, or 266; or

(iii) A facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste, if the process fluids are not hazardous waste as defined in 40 CFR part 261.

(c) In situ sampling systems and sampling systems without purges are exempt from the requirements of paragraphs (a) and (b) of this section.

§§ 60.482-6 Standards: Open-ended valves or lines.

(a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in §§ 60.482-1(c).

(2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.

(b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

(c) When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (a) at all other times.

(d) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (a), (b) and (c) of this section.

(e) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in paragraphs (a) through (c) of this section are exempt from the requirements of paragraphs (a) through (c) of this section.

§§ 60.482-7 Standards: Valves in gas/vapor service and in light liquid service.

(a) Each valve shall be monitored monthly to detect leaks by the methods specified in §§ 60.485(b) and shall comply with paragraphs (b) through (e), except as provided in paragraphs (f), (g), and (h), §§ 60.483-1, 2, and §§ 60.482-1(c).

(b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(c)(1) 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 quarter, until a leak is detected.

(2) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.

(d)(1) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in §§ 60.482-9.

(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(e) First attempts at repair include, but are not limited to, the following best practices where practicable:

(1) Tightening of bonnet bolts;

(2) Replacement of bonnet bolts;

(3) Tightening of packing gland nuts;

(4) Injection of lubricant into lubricated packing.

(f) Any valve that is designated, as described in §§ 60.486(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraph (a) if the valve:

(1) Has no external actuating mechanism in contact with the process fluid,

(2) Is operated with emissions less than 500 ppm above background as determined by the method specified in §§ 60.485(c), and

(3) Is tested for compliance with paragraph (f)(2) of this section initially upon designation, annually, and at other times requested by the Administrator.

(g) Any valve that is designated, as described in §§ 60.486(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of paragraph (a) if:

(1) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with paragraph (a), and

(2) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times.

(h) Any valve that is designated, as described in §§ 60.486(f)(2), as a difficult-to-monitor valve is exempt from the requirements of paragraph (a) if:

(1) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface.

(2) The process unit within which the valve is located either becomes an affected facility through §§ 60.14 or §§ 60.15 or the owner or operator designates less than 3.0 percent of the total number of valves as difficult-to-monitor, and

(3) The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

§§ 60.482-8 Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.

(a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall follow either one of the following procedures:

(1) The owner or operator shall monitor the equipment within 5 days by the method specified in §§ 60.485(b) and shall comply with the requirements of paragraphs (b) through (d) of this section.

(2) The owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak.

(b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(c)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §§ 60.482-9.

(2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(d) First attempts at repair include, but are not limited to, the best practices described under §§ 60.482-7(e).

§§ 60.482-9 Standards: Delay of repair.

(a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

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

(c) Delay of repair for valves will be allowed if:

(1) The owner or operator demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

(2) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with §§ 60.482-10.

(d) Delay of repair for pumps will be allowed if:

(1) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and

(2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

(e) 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.

§§ 60.482-10 Standards: Closed vent systems and control devices.

(a) Owners or operators of closed vent systems and control devices used to comply with provisions of this subpart shall comply with the provisions of this section.

(b) Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent.

(c) Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 E°C.

- (d) Flares used to comply with this subpart shall comply with the requirements of §§60.18.
- (e) Owners or operators of control devices used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs.
- (f) Except as provided in paragraphs (i) through (k) of this section, each closed vent system shall be inspected according to the procedures and schedule specified in paragraphs (f)(1) and (f)(2) of this section.
- (1) If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall comply with the requirements specified in paragraphs (f)(1)(i) and (f)(1)(ii) of this section:
- (i) Conduct an initial inspection according to the procedures in §§ 60.485(b); and
 - (ii) Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
- (2) If the vapor collection system or closed vent system is constructed of ductwork, the owner or operator shall:
- (i) Conduct an initial inspection according to the procedures in §§ 60.485(b); and
 - (ii) Conduct annual inspections according to the procedures in §§ 60.485(b).
- (g) Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practicable except as provided in paragraph (h) of this section.
- (1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- (2) Repair shall be completed no later than 15 calendar days after the leak is detected.
- (h) Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown.
- (i) If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of paragraphs (f)(1)(i) and (f)(2) of this section.
- (j) Any parts of the closed vent system that are designated, as described in paragraph (l)(1) of this section, as unsafe to inspect are exempt from the inspection requirements of paragraphs (f)(1)(i) and (f)(2) of this section if they comply with the requirements specified in paragraphs (j)(1) and (j)(2) of this section:
- (1) The owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with paragraphs (f)(1)(i) or (f)(2) of this section; and

(2) The owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.

(k) Any parts of the closed vent system that are designated, as described in paragraph (l)(2) of this section, as difficult to inspect are exempt from the inspection requirements of paragraphs (f)(1)(i) and (f)(2) of this section if they comply with the requirements specified in paragraphs (k)(1) through (k)(3) of this section:

(1) The owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and

(2) The process unit within which the closed vent system is located becomes an affected facility through §§§§ 60.14 or 60.15, or the owner or operator designates less than 3.0 percent of the total number of closed vent system equipment as difficult to inspect; and

(3) The owner or operator has a written plan that requires inspection of the equipment at least once every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum.

(l) The owner or operator shall record the information specified in paragraphs (l)(1) through (l)(5) of this section.

(1) Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment.

(2) Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment.

(3) For each inspection during which a leak is detected, a record of the information specified in §§ 60.486(c).

(4) For each inspection conducted in accordance with §§ 60.485(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.

(5) For each visual inspection conducted in accordance with paragraph (f)(1)(ii) of this section during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.

(m) Closed vent systems and control devices used to comply with provisions of this subpart shall be operated at all times when emissions may be vented to them.

3. The following insignificant emissions units are located at the facility:

T539 - corrosion inhibitor storage tank (T-19)

T540 - slop solution recovery tank (T-61)

T543 - slop solution tank and collection sump (T-60)

Z510 - natural gas fired heater

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-23.

B. State Enforceable Section

1. The following insignificant emissions unit located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P522 - ammonia plant synthesis section

P533 - chemical sewer collection sump

P544 - gas odorization station

P545 - east urea warehouse

P554 - ammonia truck loading

P555 - ammonia rail car loading

P556 - ammonia aqua rail/truck loading

P557 - urea water solution loading systems

P558 - ammonium nitrate solution truck loading

P559 - fertilizer solutions rail/truck loading

T517 - ammonium nitrate surge tank

T518 - ammonia storage tanks (T-5, T-6)

T537 - ammonia spheres (S-1, S-2, S-3 and S-4)

T538 - ammonia nitrate storage tanks (T-11, T-12 and T-13)

T544 - weak nitrate surge tank (T-8)

T546 - urea water tank (T-10)

T547 - urea water solution tank (T-55)

T548 - (2800) urea/ammonium nitrate solution storage tank (T-23)

T549 - 2800 solution storage tanks (D-11)

T550 - (2800) urea/ammonium nitrate solution storage tank (T-20)

T551 - anhydrous ammonia storage drums (D-4 and D-5)

T553 - aqua ammonia tank (T-26)

T554 - ammonia nitrate loading drum (T-7)

T556 - aqua ammonia tank (T-41)

T557 - ammonium nitrate blend and storage tanks (T-8)

T558 - urea water tanks (T-51, T-52, T-53 and T-54)

T559 - urea/ammonium nitrate solutions storage tank (T-21)

T561 - aqua ammonia tank (T-27)

T562 - aqua ammonia tank (T-28)

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015

T563 - aqua ammonia tank (T-29)
T564 - urea/ammonium nitrate solutions storage tank (T-22)
T575 - nitric acid blend tank (T-35)
T576 - nitric acid blend tank (T-7)
T605 - nitric acid 68% tank (T-12)
T606 - nitric acid 68% tank (T-13)
T610 - nitric acid 68% tank (T-36)
Z501 - weak nitrate surge tanks (T-9)
Z502 - 2800 solution storage tanks (D-12)
Z503 - 2800 solution storage tanks (D-13)
Z504 - ammonium nitrate blend and storage tanks
Z511 - nitric acid solution loading

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit: Boiler #1 (B501)

Activity Description: NG/#2 Oil Fired Boiler (227 mmBtu/hr) and Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit - 227 mmBtu/hr natural gas boiler (boiler #1)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO₂ emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

III Monitoring and/or Recordkeeping

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb/mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

VI Miscellaneous Requirements

None

B. State 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>
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2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Boiler #2 (B502)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit: Boiler #2 (B502)
 Activity Description: NG/#2 Oil Fired Boiler (227 MMBTU/hr) and Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit - 227 mmBtu/hr, natural gas boiler (boiler #2)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

III Monitoring and/or Recordkeeping

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Boiler #2 (B502)

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb/mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Boiler #2 (B502)

A. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Primary Reformer and Ancillary (B503)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit: Primary Reformer and Ancillary (B503)
 Activity Description: Ammonia Production Unit: NG/#2 Oil Fired Primary Reformer And Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit - 1023 mmBtu/hr, natural gas and/or clean process waste gas boiler (boiler #3)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-08(D)(1)	1 . 2 7 l b s s u l f u r dioxide(SO2)/mmBtu actual heat input

2. Additional Terms and Conditions

- 2.a The permittee burns only natural gas and/or clean process waste gas in this emissions unit, therefore, no monitoring, record keeping or reporting is necessary to show compliance with the SO2 limitation.

II Operational Restrictions

1. The permittee shall burn only natural gas and/or clean process waste gas in this emissions unit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Primary Reformer and Ancillary (B503)

III Monitoring and/or Recordkeeping

1. For each day during which the permittee burns a fuel other than natural gas and/or clean process waste gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or clean process waste gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb/mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- c. Emission Limitation: 1.27 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing natural gas and/or clean process waste gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, compliance with the limitation above shall be determined in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Primary Reformer and Ancillary (B503)

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit: Primary Reformer and Ancillary (B503)

B. State 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>
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2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Ammonia Unit Converter Startup Heater (B504)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Unit Converter Startup Heater (B504)
 Activity Description: NG Indirect Fired Startup Heater (20 MMBTU/hr). Refer to the overall ammonia synthesis process description and flow diagram.

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>
37 mmBtu/hr, natural gas ammonia unit converter startup heater	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

III Monitoring and/or Recordkeeping

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Unit Converter Startup Heater (B504)

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb/mmBtu PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Gas Turbine (B506)

B. State 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>
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2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Gas Turbine (B506)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit Gas Turbine (B506)
 Activity Description: NG Fired Gas Turbine (210 MMBTU/hr). Refer to the overall ammonia synthesis process description and flow diagram.

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>
210 mmBtu/hr, ammonia production unit, natural gas-fired turbine	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(4)	0.040 lb PE/mmBtu of actual heat input

2. **Additional Terms and Conditions**

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

III Monitoring and/or Recordkeeping

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Gas Turbine (B506)

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.040 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance with the lb/mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Gas Turbine (B506)

B. State 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>
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2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: (B507)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: (B507)

Activity Description:

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>
25 mmBtu/hr, natural gas ammonia load heater	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-31-05 (PTI #03-7191)	0.5 lb PE/hr, 2.19 TPY PE
		0.02 lb sulfur dioxide (SO ₂)/hr, 0.09 TPY SO ₂
		1.5 lbs nitrogen oxides (NO _x)/hr, 6.57 TPY NO _x
		4.0 lbs carbon monoxide (CO)/hr, 17.52 TPY CO
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-23-06(B) and 3745-21-08(B).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	see A.I.2.b.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (B507)

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO₂ emission limitation is established by OAC Chapter 3745-18 for this emissions unit.
- 2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install No. 03-7191.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II Operational Restrictions

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.

III Monitoring and/or Recordkeeping

- 1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V Testing Requirements

- 1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (B507)

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb/mmBtu PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- c. Emission Limitations: 0.5 lb PE/hr, 2.19 TPY PE

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filtrable)/mm cu. ft.

[The emission factor used above from AP-42, Table 1.4-2 is based on an average natural gas heating value of 1020 Btu/scf. The emission factor may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to the average heating value of 1020 Btu/scf.]

If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be ensured.

- d. Emission Limitations: 0.02 lb SO₂/hr, 0.09 TPY SO₂

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 lb SO₂/mm cu. ft.]

The emission factor used above from AP-42, Table 1.4-2 is based on an average natural gas heating value of 1020 Btu/scf. The emission factor may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to the average heating value of 1020 Btu/scf.]

If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (B507)

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be ensured.

- e. Emission Limitations: 1.5 lbs NO_x/hr, 6.57 TPY NO_x

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from the manufacturer of 60 lbs NO_x/mm cu. ft

If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be ensured.

- f. Emission Limitation: 4.0 lbs CO/hr, 17.52 TPY CO

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 84 lbs CO/mm cu. ft.

[The emission factor used above from AP-42, Table 1.4-2 is based on an average natural gas heating value of 1020 Btu/scf. The emission factor may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to the average heating value of 1020 Btu/scf.]

If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be ensured.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (B507)

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (B507)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Ammonia Production Unit Reforming Section (P520)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit Reforming Section (P520)
 Activity Description: Ammonia Plant Reforming Section-Primary And Secondary Reformers, Desulfurization Drums, Primary And Secondary Shift Convertors, High Pressure Condensate Stripper, And Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit reforming section	none	none

2. **Additional Terms and Conditions**

- 2.a This emissions unit's potential to emit for organic compounds is greater than 5 tons per year, and, therefore, is considered a non-insignificant emissions unit. However, there are no applicable regulations for this emissions unit.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Reforming Section (P520)

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Reforming Section (P520)

B. State 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>
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2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Ammonia Production Unit Purification Section (P521)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit Purification Section (P521)
 Activity Description: Ammonia Plant Purification Section - Condensate Separators, CO2 Absorber, Absorber KO, Methanator and Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit purification section	none	none

2. Additional Terms and Conditions

- 2.a This emissions unit's potential to emit for organic compounds is greater than 5 tons per year, and, therefore, is considered a non-insignificant emissions unit. However, there are no applicable regulations for this emissions unit.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Purification Section (P521)

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit Purification Section (P521)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Ammonia Production Unit CO2 Stripper Section (P523)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonia Production Unit CO2 Stripper Section (P523)
 Activity Description: Ammonia Plant Condensate Purification Section: CO2 Stripper, Deaerator, and Ancillary Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

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>
ammonia production unit CO2 stripper section	none	none

2. Additional Terms and Conditions

- 2.a This emissions unit's potential to emit for organic compounds is greater than 5 tons per year, and, therefore, is considered a non-insignificant emissions unit. However, there are no applicable regulations for this emissions unit.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit CO2 Stripper Section (P523)

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonia Production Unit CO2 Stripper Section (P523)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Urea Prilling Dryer Cyclone (P524)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Prilling Dryer Cyclone (P524)
 Activity Description: Urea Plant Prilling Section - Crystal Drying, Conveying, Melting And Associated Equipment. Refer to the overall ammonia synthesis process description and flow diagram.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
urea plant prilling section, equipped with cyclone and scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	42.9 lbs PE/hr

2. Additional Terms and Conditions

None

II Operational Restrictions

- The pressure drop across the scrubber shall be continuously maintained at a minimum value, in inches of water, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a minimum value, in gallons per minute, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The permittee may petition to the OEPA for reestablishment, based on emissions testing or the collection of data, of the scrubber flow rate and pressure drop minimum values provided the permittee can demonstrate to the OEPA's satisfaction that the new minimum values will

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Dryer Cyclone (P524)

reasonably ensure compliance and the operating conditions upon which the minimum values were previously established are no longer applicable.

The operation of the control equipment outside the minimum values that will be established above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Northwest District Office, compliance with the mass emission limitations and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the minimum values that will be established above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III Monitoring and/or Recordkeeping

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each shift:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV Reporting Requirements

1. The permittee shall submit *quarterly* deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels established pursuant to Section A.II of this permit:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Dryer Cyclone (P524)

2. The permittee shall submit quarterly summary reports that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for PE. The permittee shall also record the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons/minute, every 5 minutes during each test run.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Dryer Cyclone (P524)

2. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 42.9 lbs PE/hr

Applicable Compliance Method: Compliance with the hourly PE limitation above shall be based upon the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10).

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Dryer Cyclone (P524)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Mother Liquor System (P525)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Prilling Mother Liquor System (P525)
 Activity Description: Urea Plant Prilling Section - Crystallizer/Mother Liquor Tank And Ancillary Equipment.
 Refer to the overall ammonia synthesis process description and flow diagram.

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>
urea prilling mother liquor system	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. **Additional Terms and Conditions**

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Mother Liquor System (P525)

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Prilling Mother Liquor System (P525)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Synthesis Section (P526)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Plant Synthesis Section (P526)
Activity Description: Urea Plant Synthesis Section including Urea Reactor (PR 76-0372), High Pressure Decomposer, and Product Concentrator. Refer to the overall ammonia synthesis process description and flow diagram.

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>
urea plant synthesis system with condensers and scrubber	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Synthesis Section (P526)

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Synthesis Section (P526)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Urea Dissolving Tank (P527)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Dissolving Tank (P527)
 Activity Description: Urea Plant Prilling Section - Lump Dissolving System. Refer to the overall ammonia synthesis process description and flow diagram.

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>
urea plant prilling section - lump dissolving system	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. These requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Dissolving Tank (P527)

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Dissolving Tank (P527)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Crystallizer Section (P528)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Crystallizer Section (P528)
Activity Description: Urea Plant Prilling Section - Crystallizer And Associated Equipment. Refer to the overall Urea Prilling Section process description and flow diagram.

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>
urea plant prilling section - crystallizer and associated equipment with condensers	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. These requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Crystallizer Section (P528)

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Crystallizer Section (P528)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Concentrator Section (P529)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Plant Concentrator Section (P529)

Activity Description: Urea Plant Concentrator Section - Concentrator, And Associated Equipment. Refer to the overall Urea Synthesis Section process description and flow diagram.

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>
urea plant concentrator section with condensers	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. These requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Concentrator Section (P529)

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Concentrator Section (P529)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Ammonium Nitrate Neutralizer System (P531)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ammonium Nitrate Neutralizer System (P531)
 Activity Description: 450 Ton/Day Ammonium Nitrate Plant With Vent Scrubbers Also Provides Emission Controls For Source T517. Refer to the overall Ammonium Nitrate Plant process description and flow diagram.

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>
ammonium nitrate neutralizer system, equipped with a condenser and wet scrubbers	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	15.4 lbs PE/hr

2. Additional Terms and Conditions

None

II Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a minimum value, in inches of water, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a minimum value, in gallons per minute, that shall be established, based on testing and/or data collection, within 6 months after the issuance of the permit, at all times while the emissions unit is in operation.

The permittee may petition to the OEPA for reestablishment, based on emissions testing or the collection of data, of the scrubber flow rate and pressure drop minimum values provided the permittee can demonstrate to the OEPA’s satisfaction that the new minimum values will

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonium Nitrate Neutralizer System (P531)

reasonably ensure compliance and the operating conditions upon which the minimum values were previously established are no longer applicable.

The operation of the control equipment outside the minimum values that will be established above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Northwest District Office, compliance with the mass emission limitations and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the minimum values that will be established above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III Monitoring and/or Recordkeeping

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each shift:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels established pursuant to Section A.II of this permit:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonium Nitrate Neutralizer System (P531)

2. The permittee shall submit quarterly summary reports that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 15.4 lbs PE/hr

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly PE limitation based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

Compliance with this limitation may also be demonstrated by multiplying the maximum process weight rate of 18.75 tons/hr by the emission factor, from AP-42, Table 8.3-2, of 8.6 lb PE/ton and by a control factor of (1 - 0.95).

* The control efficiency for the scrubber system is assumed to be efficiency of 95%.
2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for PE. The permittee shall also record the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons/minute, every 5 minutes during each test run.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonium Nitrate Neutralizer System (P531)

- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Ammonium Nitrate Neutralizer System (P531)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Nitric Acid Tanks (T-31, 32, 33) (P532)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Nitric Acid Tanks (T-31, 32, 33) (P532)
 Activity Description: Nitric Acid and Ammonium Nitrate Blending and Storage: North & South Acid Blend Tanks and Storage Tank in Nitric Acid Plant - P.R. 4075, 4025, and 4050.

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>
nitric acid and ammonium nitrate blending and storage tanks (T-31, T-32, T-33)	none	none

2. **Additional Terms and Conditions**

- 2.a This emissions unit's potential to emit for nitrogen oxides is greater than 5 tons per year, and, therefore, is considered a non-insignificant emissions unit. However, there are no applicable regulations for this emissions unit.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Nitric Acid Tanks (T-31, 32, 33) (P532)

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Nitric Acid Tanks (T-31, 32, 33) (P532)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: West Urea Warehouse Operations (P536)
 Activity Description: West Urea Warehouse - Warehouse, Bagging, And Bulk Loading Operations For Prilled Urea. Refer to overall Urea Prilling process description and flow diagram.

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>
prilled urea warehouse operations, equipped with a baghouse and a scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	5.4 lbs PE/hr

2. **Additional Terms and Conditions**

None

II Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a minimum value, in inches of water, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a minimum value, in gallons per minute, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The permittee may petition to the OEPA for reestablishment, based on emissions testing or the collection of data, of the scrubber flow rate and pressure drop minimum values provided the permittee can demonstrate to the OEPA's satisfaction that the new minimum values will

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

reasonably ensure compliance and the operating conditions upon which the minimum values were previously established are no longer applicable.

The operation of the control equipment outside the minimum values that will be established above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Northwest District Office, compliance with the mass emission limitations and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the minimum values that will be established above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III Monitoring and/or Recordkeeping

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each shift:

- a. The pressure drop across the scrubber, in inches of water.
 - b. The scrubber water flow rate, in gallons per minute.
 - c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels established pursuant to Section A.II of this permit:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit quarterly summary reports that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 5.4 lbs PE/hr

Applicable Compliance Method:

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

The permittee shall demonstrate compliance with the hourly PE limitation based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

Compliance with this limitation may also be demonstrated by multiplying the maximum process weight rate of 166.67 tons/hr by the emission factor from AP-42, Table 8.2-1 of 0.19 lb PE/ton and by a control factor of (1 - 0.95).

* The control efficiency for the control system is assumed to be efficiency of 95%.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for PE. The permittee shall also record the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons/minute, every 5 minutes during each test run.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: West Urea Warehouse Operations (P536)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Granulation Plant Scrubber (P546)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Granulation Plant Scrubber (P546)
 Activity Description: Urea Granulation Plant - Granulation Section, Granulator Drum, and associated equipment. Refer to the overall Urea Granulation process description and flow diagram.

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>
urea granulation plant with scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(DD)	See A.I.2.b.
	40 CFR, Part 60, Subpart VV	See A.I.2.b.
	OAC rule 3745-31-05 (PTI #03-968)	18.0 lbs PE/hr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-09(DD), and 40 CFR, Part 60, Subpart VV.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulation Plant Scrubber (P546)

2. Additional Terms and Conditions

- 2.a The permittee does not currently employ and has never before employed any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5). Therefore, this emission unit is exempt from OAC rule 3745-21-07(G)(2). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01, and would require the permittee to obtain a PTI modification.
2. b The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV for this emissions unit. These Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.

II Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a minimum value, in inches of water, that is shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a minimum value, in gallons per minute, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The permittee may petition to the OEPA for reestablishment, based on emissions testing or the collection of data, of the scrubber flow rate and pressure drop minimum values provided the permittee can demonstrate to the OEPA's satisfaction that the new minimum values will reasonably ensure compliance and the operating conditions upon which the minimum values were previously established are no longer applicable.

The operation of the control equipment outside the minimum values that will be established above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Northwest District Office, compliance with the mass emission limitations and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the minimum values that will be established above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III Monitoring and/or Recordkeeping

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulation Plant Scrubber (P546)

maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each shift:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute, .
- c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels established pursuant to Section A.II of this permit:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit quarterly summary reports that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months following the issuance of this permit. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for PE. The permittee shall also record the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons/minute, every 5 minutes during each test run.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 of 40 CFR, Part 60, Appendix A.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulation Plant Scrubber (P546)

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 18.0 lbs PE/hr

Applicable Compliance Method: Compliance with the hourly PE limitation above shall be based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulation Plant Scrubber (P546)

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulation Plant Scrubber (P546)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Granulator Plant Evaporator (P547)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Granulator Plant Evaporator (P547)
 Activity Description: Urea Granulation Plant Section - Evaporator and associated equipment. Refer to the overall Urea Granulation process description and flow diagram.

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>
urea granulator plant evaporator, equipped with a scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(DD)	See A.I.2. b.
	40 CFR, Part 60, Subpart VV	See A.I.2. b.
	OAC rule 3745-31-05 (PTI #03-968)	4.0 lbs PE/hr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-09(DD), and 40 CFR, Part 60, Subpart VV.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulator Plant Evaporator (P547)

2. Additional Terms and Conditions

- 2.a The permittee does not currently employ and has never before employed any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5). Therefore, this emission unit is exempt from OAC rule 3745-21-07(G)(2). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01, and would require the permittee to obtain a PTI modification
2. b The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV for this emissions unit. Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.c This emissions unit is vented to a scrubber that also controls the emissions from emissions unit P546. All operational restrictions, monitoring, record keeping, reporting and testing requirements for the scrubber are established in the terms and conditions for emissions unit P546 and are also applicable to emissions unit P0547. Therefore, no additional monitoring, record keeping, reporting and testing requirements are necessary for this emissions unit.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 4.0 lbs PE/hr

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulator Plant Evaporator (P547)

Applicable Compliance Method: If required, compliance with the hourly PE limitation above shall be based on the results of the emission testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Granulator Plant Evaporator (P547)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: HPD Ammonium Nitrate Evaporator (P553)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: HPD Ammonium Nitrate Evaporator (P553)
 Activity Description: HPD Ammonium Nitrate Evaporator associated with the Chem Seps Unit in Blending, Shipping and Storage - P.R. 5104

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>
HPD ammonium nitrate evaporator	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	OAC rule 3745-31-05 (PTI #03-968)	The requirements of this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).

2. Additional Terms and Conditions

- 2.a PE from this emissions unit shall be less than 10 lbs/hr*.

*The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. However, to ensure that Figure II will not be applicable, the permittee has agreed to accept the PE limitation stated above (less than 10 lbs/hr).

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: HPD Ammonium Nitrate Evaporator (P553)

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: HPD Ammonium Nitrate Evaporator (P553)

- b. Emission Limitation: less than 10 lbs PE/hr

Applicable Compliance Method: Compliance with this limitation may be demonstrated by multiplying the maximum process weight rate of 17.5 tons/hr by the emission factor, from AP-42, Table 8.3-2, of 0.52 lb PE/ton .

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: HPD Ammonium Nitrate Evaporator (P553)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Prill Tower (P560)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Plant Prill Tower (P560)
 Activity Description: Urea Plant Prilling Section - Prill Tower, Wet Scrubber System, And Associated Equipment. Refer to overall Urea Prilling process description and flow diagram.

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>
urea plant prill tower, equipped with a scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	50.0 lbs PE/hr
	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

1. The pressure drop across the washed filter media (scrubber), in inches of water, shall be maintained at a minimum value of 0.5 inch of water, while the emissions unit is in operation.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Prill Tower (P560)

The scrubber water flow rate shall be continuously maintained at a minimum value, in gallons per minute, that shall be established, based on testing and/or data collection, within 6 months after the effective date of the permit, at all times while the emissions unit is in operation.

The permittee may petition to the OEPA for reestablishment, based on emissions testing or the collection of data, of the scrubber flow rate and pressure drop minimum values provided the permittee can demonstrate to the OEPA's satisfaction that the new minimum values will reasonably ensure compliance and the operating conditions upon which the minimum values were previously established are no longer applicable..

The operation of the control equipment outside the minimum value that will be established above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Northwest District Office, compliance with the mass emission limitations and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the ranges that will be established above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III Monitoring and/or Recordkeeping

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each shift:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels established pursuant to Section A.II of this permit:

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Prill Tower (P560)

- a. The static pressure drop across the scrubber.
- b. The scrubber water flow rate.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 50.0 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly PE limitation above based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

Compliance with this limitation may also be demonstrated by multiplying the maximum process weight rate of 41.67 tons/hr by the emission factor, from AP-42, Table 8.2-1, of 6.2 lbs PE/ton and by a control factor of $(1 - 0.95)^*$.

* The control efficiency for the washed filter media is assumed to be 95%.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for PE. The permittee shall also record the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons/minute, every 5 minutes during each test run.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 of 40 CFR, Part 60, Appendix A.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Prill Tower (P560)

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Plant Prill Tower (P560)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Reactor Feed Section (P563)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Reactor Feed Section (P563)

Activity Description: Urea Plant Synthesis Section - Reactor Feed Section incl. NH3 feed pump PR 70-7434.
Refer to overall Urea Synthesis process description and flow diagram.

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>
urea plant synthesis section - reactor feed section	OAC rule 3745-21-09(DD)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) for this emissions unit. Requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.
- 2.b This facility is located in Allen County, which is not considered a "Priority I" county as indicated by paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is not subject to the requirements of OAC rule 3745-21-07.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Reactor Feed Section (P563)

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Reactor Feed Section (P563)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: UTI Hotwell Section (P564)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: UTI Hotwell Section (P564)

Activity Description: Urea Plant Synthesis Section - Condensate Collection Section. Refer to overall Urea Synthesis process description and flow diagram.

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>
urea plant synthesis section - condensate collection system, equipped with a scrubber	OAC rule 3745-31-05 (PTI #03-968)	The PTI only required compliance with the applicable law at the time of issuance.

2. Additional Terms and Conditions

- 2.a The permittee does not currently employ and has never before employed any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5). Therefore, this emission unit is exempt from OAC rule 3745-21-07(G)(2). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01, and would require the permittee to obtain a PTI modification
- 2.b This emissions unit is vented to a scrubber, but there are no underlying regulations that establish any emission limitations, or require the use of a scrubber. Therefore, there are no monitoring, record keeping or reporting requirements established for the scrubber.
- 2.c This emissions unit's potential to emit for organic compounds is greater than 5 tons per year, and, therefore, is considered a non-insignificant emissions unit. However, there are no applicable regulations for this emissions unit

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: UTI Hotwell Section (P564)

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: UTI Hotwell Section (P564)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #2 Nitric Acid Plant (P570)

Activity Description: #2 Nitric Acid Plant - 400 ton/day nitric acid plant with extended absorption and catalytic NOx reduction. Refer to overall Nitric Acid Plant process description and flow diagram.

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>
400 tons/day #2 nitric acid plant	40 CFR, Part 60, Subpart G OAC rule 3745-31-05 (PTI #03-5319)	See A.I.2.a. 23.2 lbs nitrogen oxides (NOx)/hr, 101.6 TPY NOx 1.4 lbs NOx/ton of acid produced The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart G.

2. Additional Terms and Conditions

- 2.a The permittee shall not discharge into the atmosphere from this emissions unit any gases which:
 - i. contain nitrogen oxides, expressed as NO2, in excess of 1.5 kg per metric ton of acid produced (3.0 lbs per ton), the production being expressed as 100% nitric acid; and
 - ii. exhibit 10% opacity, or greater.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

II Operational Restrictions

1. The permittee shall operate and maintain a continuous monitoring system for measuring nitrogen oxides (NO_x). The pollutant gas mixtures under Performance Specification 2 and for calibration checks under 40 CFR 60.13(d) of this part shall be nitrogen dioxide (NO₂). The span value shall be 500 ppm of NO₂. Method 7 shall be used for the performance evaluations under 40 CFR 60.13(c). Acceptable alternative methods to Method 7 are given in 40 CFR 60.74(c). [40 CFR 60.73(a)]

III Monitoring and/or Recordkeeping

1. The permittee shall establish a conversion factor for the purpose of converting monitoring data into units of acceptable standard (kg/metric ton, lb/ton). The conversion factor shall be established by measuring emissions with the continuous monitoring system concurrent with measuring emissions with the applicable reference method tests. Using only that portion of the continuous monitoring emission data that represents emission measurements concurrent with the reference method test periods, the conversion factor shall be determined by dividing the reference method test data averages by the monitoring data averages to obtain a ratio expressed in units of the applicable standard to units of the monitoring data, i.e., kg/metric ton per ppm (lb/ton per ppm). The conversion factor shall be reestablished during any performance test under 40 CFR 60.8 or any continuous monitoring system performance evaluation under 40 CFR 60.13(c). [40 CFR 60.73(b)]
2. The permittee shall record the daily production rate and hours of operation. [40 CFR 60.73(c)]
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

IV Reporting Requirements

1. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as any 3-hour period during which the average nitrogen oxides emissions (arithmetic average of three contiguous 1-hour periods) as measured by a continuous monitoring system exceed the standard under 40 CFR 60.72(a). [40 CFR 60.73(e)]
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration. Further testing will be conducted in accordance with Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the NOx emissions limits.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for NOx Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
 - e. The permittee shall determine compliance with the NOx standard in 40 CFR 60.72(a) as follows:
 - i. The emission rate (E) of NOx shall be computed for each run using the following equation: $E = (Cs * Qsd) / (P * K)$

where:

E = emission rate of NOx as NO2, kg/metric ton (lb/ton) of 100% nitric acid

Cs = concentration of NOx as NO2, g/dscm (lb/dscf)

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

Q_{sd} = volumetric flow rate of effluent gas, dscm/hr (dscf/hr)

P = acid production rate, metric ton/hr (ton/hr) or 100% nitric acid

K = conversion factor, 1000 g/kg (1.0 lb/lb).

- ii. Method 7 shall be used to determine the NO_x concentration of each grab sample. Method 1 shall be used to select sampling site, and the sampling point shall be the centroid of the stack or duct or at a point no closer to the walls than 1 m (3.28 ft.). Four grab samples shall be taken at approximately 15-minute intervals. The arithmetic mean of the four sample concentrations shall constitute the run value (C_s).
 - iii. Method 2 shall be used to determine the volumetric flow rate (Q_{sd}) of the effluent gas. The measurement site shall be the same as for the NO_x sample. A velocity transverse shall be made once per run within the hour that the NO_x samples are taken.
 - iv. The methods of 40 CFR 60.73(c) shall be used to determine the production rate (P) of 100% nitric acid for each run. Material balance over the production system shall be used to confirm the production rate.
- f. The permittee may use the following as alternatives to the reference methods and procedures specified in this section:
- i. For Method 7, Method 7A, 7B, 7C or 7D may be used. If Method 7C is used, the sampling time shall be at least 1 hour.
 - ii. The permittee shall use the procedures in 40 CFR 60.73(b) to determine the conversion factor for converting the monitoring data to the units of the standard.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** The permittee shall not discharge into the atmosphere from this emissions unit any gases which contain nitrogen oxides, expressed as NO₂, in excess of 1.5 kg per metric ton of acid produced (3.0 lb per ton), the production being expressed as 100% nitric acid

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.
 - b. **Emission Limitation:** The permittee shall not discharge into the atmosphere from this emissions unit any gases which exhibit 10% opacity, or greater.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Method 9 of 40 CFR, Part 60, Appendix A.
 - c. **Emission Limitations:** 23.2 lbs NO_x/hr, 101.6 TPY NO_x

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall be shown with the annual limitation.
 - d. **Emission Limitation:** 1.4 lbs NO_x/ton of acid produced

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.
3. The permittee shall conduct, or have conducted, an annual performance evaluation of this emissions unit. Such an evaluation shall include, but not be limited to the following information:

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

- a. actual production records;
- b. control equipment efficiency and reliability including all down time;
- c. actual emissions based on continuous emission, monitoring data; and
- d. methods investigated and/or implemented to improve control efficiency and/or reduce emissions.

This report shall be submitted by February 1 of each year and shall cover data obtained during the previous operating year.

VI Miscellaneous Requirements

Nonr

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: #2 Nitric Acid Plant (P570)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (P571)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: (P571)

Activity Description:

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>
#1 cooling tower nitric acid unit	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	76.2 lbs PE/hr

2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permittee shall test and record the total dissolved solids content (mg/l) of the cooling water on a weekly basis. The permittee shall use the following procedure to measure the amount of dissolved solids:
 - a. Take a sample of the water once every week.
 - b. Determine the concentration of the total dissolved solids by measuring the conductivity (using a conductivity meter*) of the cooling tower water, in mg/l.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (P571)

- c. Determine the PE rate, in pounds/hr, using the methodology outlined in section A.V.1.b of this permit.

*The conductivity meter shall be calibrated and operated in accordance with manufacturer's specifications and recommendations.

IV Reporting Requirements

1. The permittee shall submit quarterly summary reports that include the results of the dissolved solids content (mg/l) tests.
2. The permittee shall submit quarterly deviation reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the PE limitation of 76.2 pounds.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 76.2 lbs PE/hr

Applicable Compliance Method: Compliance with this limitation may be demonstrated by multiplying the maximum water flow rate (gallons/hr) by the maximum dissolved solids content (mg/l), based on record keeping established in section A.III, and by the maximum drift loss factor (0.0002*), and then by the conversion factors of 3.785 l/gal and lb/453,592 mg.

*based on AP-42, Table 13.4-1

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (P571)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: (P572)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: (P572)

Activity Description:

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>
#2 cooling tower ammonia unit	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	107 lbs PE/hr

2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permittee shall test and record the total dissolved solids content (mg/l) of the cooling water on a weekly basis. The permittee shall use the following procedure to measure the amount of dissolved solids:
 - a. Take a sample of the water once every week.
 - b. Determine the concentration of the total dissolved solids by measuring the conductivity (using a conductivity meter*) of the cooling tower water, in mg/l.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (P572)

- c. Determine the PE rate, in pounds/hr, using the methodology outlined in section A.V.1.b of this permit.

*The conductivity meter shall be calibrated and operated in accordance with manufacturer's specifications and recommendations

IV Reporting Requirements

1. The permittee shall submit quarterly summary reports that include the results of the dissolved solids content (mg/l) tests.
2. The permittee shall submit quarterly deviation reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the PE limitation of 107 pounds.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 107 lbs PE/hr

Applicable Compliance Method: Compliance with this limitation may be demonstrated by multiplying the maximum water flow rate (gallons/hr) by the maximum dissolved solids content (mg/l), based on record keeping established in section A.III, and by the maximum drift loss factor (0.0002*), and then by the conversion factors of 3.785 l/gal and lb/453,592 mg.

*based on AP-42, Table 13.4-1

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: (P572)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Formadehyde Storage Tank (UF-85) (T560)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Urea Formaldehyde Storage Tank (UF-85) (T560)
 Activity Description: T-62, 27,500 Gallon Fixed Roof Urea Formaldehyde Storage Tank & Ancillary Equipment At The Granulation Plant.

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>
27,500-gallon, fixed roof urea formaldehyde storage tank (T-62)	OAC rule 3745-21-09(DD)	See A.I.2.b.
	40 CFR, Part 60, Subpart VV	See A.I.2.b.
	OAC rule 3745-31-05 (PTI #03-968)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV.

2. Additional Terms and Conditions

- 2.a The permittee does not currently employ and has never before employed any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5). Therefore, this emission unit is exempt from OAC rule 3745-21-07(G)(2). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01, and would require the permittee to obtain a PTI modification
- 2.b The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV for this emissions unit. These requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.

II Operational Restrictions

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Formadehyde Storage Tank (UF-85) (T560)

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Urea Formadehyde Storage Tank (UF-85) (T560)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
 Facility ID: 0302020015
 Emissions Unit: Methanol Tank (T589)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Methanol Tank (T589)

Activity Description: 2,300 Gallon Fixed Roof Methanol Storage Tank at Water Treatment - P.R. 76-4068

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>
2300-gallon, fixed roof methanol storage tank	OAC rule 3745-21-09(DD)	See A.I.2.b.
	40 CFR, Part 60, Subpart VV	See A.I.2.b.
	OAC rule 3745-31-05 (PTI #03-6956)	0.05 ton volatile organic compounds (VOC)/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV.

2. Additional Terms and Conditions

- 2.a The permittee does not currently employ and has never before employed any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5). Therefore, this emission unit is exempt from OAC rule 3745-21-07(G)(2). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01, and would require the permittee to obtain a PTI modification
- 2.b The permittee shall comply with all applicable standards in OAC rule 3745-21-09(DD) and 40 CFR, Part 60, Subpart VV for this emissions unit. These requirements are listed in Part II - Specific Facility Terms and Conditions of this permit.

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Methanol Tank (T589)

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the amount of material throughput, in gallons; and
 - b. the VOC emissions, in tons, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section A.III.2.a. above.

IV Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 0.05 ton VOC/yr

Applicable Compliance Method: The permittee may demonstrate compliance with the limitation above based on the record keeping requirements established in section A.III.1 of this permit.

VI Miscellaneous Requirements

None

Facility Name: BP Chemicals, Inc.
Facility ID: 0302020015
Emissions Unit: Methanol Tank (T589)

B. State 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>
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2. **Additional Terms and Conditions**

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None