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

02/02/06

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

04-48-02-0080
Veolia Water North American Operating Services Inc
Owen K Bledsoe
1819 Woodville Road
Oregon, OH 43616-0920

Dear Owen K Bledsoe:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Toledo Div of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

**Ohio EPA, Division of Air Pollution Control**
**Permit Issuance and Data Management Section**
**Draft Title V Permit Correspondence**
**122 South Front Street**
**Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Toledo Div of Environmental Services.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PMU
Toledo Div of Environmental Services
Indiana
Michigan

State of Ohio Environmental Protection Agency

# DRAFT TITLE V PERMIT

| Issue Date: 02/02/06 | 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: 04-48-02-0080 to:

Veolia Water North American Operating Services Inc
1819 Woodville Road
Oregon/Lucas, OH 43616-0920

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

P001 (Wastewater)
Wastewater Treatment Unit. Modification in 1992 to comply with NSPS

T105 (Tank 11011)
Tank 11011

T106 (Tank 11010)
Tank 11010 - Slop Oil Tank

T108 (Tank 11009)
Tank 11009 - Slop Oil Tank

T143 (Tank 11001)
Tank 11001

T144 (Tank 11002)
Tank 11002

T145 (Tank 11003)
Tank 11003

T146 (Tank 11007)
Tank 11007

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 3745-77-08(E) 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:

Toledo Div of Environmental Services
348 South Erie Street
Toledo, OH 43602-1633
(419) 936-3015

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
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 (i.e., postmarked) 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 reportable under OAC rule 3745-15-06(B) 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 (i.e., postmarked) 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 deviation reports shall satisfy the requirements 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. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

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 satisfies 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 (for the deviations so reported) the requirements 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:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any 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 (i.e., postmarked) 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. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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 and 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) and OAC rule 3745-77-07(A)(13)(b))*

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.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   *(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(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 (i.e., postmarked) 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, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). 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 or Emissions Levels**

Each IEU 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 from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which 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 Title V permit 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.
*(Authority for term: OAC rule 3745-77-01)*

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**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 <u>Federally Enforceable</u> 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 (i.e., postmarked) 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; or

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; or

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.** The following insignificant emissions units are located at this facility:

T107 - tank #11008 permantly shut down.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as 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 SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))

## B. State Only Enforceable Section

**1.** The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - laboratory equipment;
Z002 - acid storage tank;
Z003 - welding equipment;
Z004 - diesel fuel dispensing truck;
Z005 - cleanup activities;
Z006 - abrasive and blasting activities;
Z007 - paved roads; and
Z008 - unpaved roads.

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Wastewater (P001)

**Activity Description:** Wastewater Treatment Unit. Modification in 1992 to comply with NSPS

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| wastewater treatment system - using carbon adsorption as the control equipment | OAC rule 3745-31-05(A)(3) (PTI 04-718) | Volatile organic compounds (VOC) from the dissolved nitrogen flotation unit shall not exceed 11.15 lbs/hr and 48.8 tpy.<br><br>VOC from the activated sludge system shall not exceed 5.70 lbs/hr and 24.97 tpy. |
| | 40 CFR Part 63, Subpart CC | See sections A.I.2.a, A.I.2.b, A.I.2.c, A.I.2.d and A.I.2.g through A.I.2.s below. |
| | OAC rule 3745-21-09(M) | See section A.I.2.e below. |
| | 40 CFR Part 60, Subpart GGG | See sections A.I.2.f, A.I.2.t and A.I.2.u below. |

**2. Additional Terms and Conditions**

**2.a** [63.640(c) and (c)(3)
For the purpose of 40 CFR Part 63, Subpart CC, the affected source shall comprise all emission points that are located at a single refinery plant site including all wastewater streams and treatment operations associated with petroleum refining process units meeting the criteria in 40 CFR 63.640(a).

**2.b** [63.640(o)(1)]
[63.640(o)]
Overlap of 40 CFR Part 63, Subpart CC with other regulations for wastewater.

i. [63.640(o)(1)]
A Group 1 wastewater stream managed in a piece of equipment that is also subject to the provisions of 40 CFR Part 60, Subpart QQQ is required to comply only with 40 CFR Part 63, Subpart CC.

## 2. Additional Terms and Conditions (continued)

**2.c** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
i. Except as provided in 40 CFR 63.647(b) [paragraph ii. of this section], the permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

[63.647(b)]
ii. As used in this section, all terms not defined in 40 CFR 63.641 of Subpart CC shall have the meaning given them in the Clean Air Act or in 40 CFR Part 61, Subpart FF, Section 61.341.

**2.d** The permittee currently employs carbon adsorption as the control equipment; however, the permittee has the option of employing any of the control equipment listed in 40 CFR Part 61, Subpart FF and, as such, would be responsible for any associated monitoring, record keeping, reporting and/or testing requirements. Should a change in control equipment occur, the permittee shall notify the Toledo Division of Environmental Services within 30 days after installation.

**2.e** Except for any wastewater separator which is used solely for once-through, noncontact cooling water or for intermittent tank farm drainage resulting from accumulated precipitation, the permittee shall control the emissions of VOC from any wastewater separator by equipping all forebay sections and other separator sections with covers and seals which minimize the amount of oily water exposed to the ambient air. In addition, all covers and forebay and separator sections shall be equipped with lids and seals which are kept in a closed position at all times except when in actual use.

**2.f** The permittee shall comply with the requirements of 40 CFR Part 60, Subpart VV for the compressors on the dissolved nitrogen flotation unit, pursuant to 40 CFR 60.592(a).

**2.g** GENERAL STANDARDS - 40 CFR Part 61, Subpart FF
[61.342(c)(1)]
For each waste stream that contains benzene, including (but not limited to) organic waste streams that contain less than 10 percent water and aqueous waste streams, even if the wastes are not discharged to an individual drain system, the permittee shall:

[61.342(c)(1)(i)]
i. Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348 [see section A.I.2.(Standards for Treatment Processes)].

[61.342(c)(1)(ii)]
ii. Comply with the standards specified in 40 CFR 61.343 through 61.347 [see sections A.I.2. and A.III.] for each waste management unit that receives or manages the waste stream prior to and during treatment of the waste stream in accordance with section A.I.2.a.

**2.h** [61.342(c)(2)]
A waste stream is exempt from 40 CFR 61.342(c)(1) [see section A.I.2.] provided that the permittee demonstrates initially and, thereafter, at least once per year that the flow-weighted annual average benzene concentration for the waste stream is less than 10 ppmw as determined by the procedures specified in 40 CFR 61.355(c)(2) or 40 CFR 61.355(c)(3) [see section A.V.].

## 2. Additional Terms and Conditions (continued)

**2.i** STANDARDS: INDIVIDUAL DRAIN SYSTEMS - 40 CFR Part 61, Subpart FF
[61.346(a)]
Except as provided in 40 CFR 61.346(b) [see section A.I.2.], the permittee shall meet the following standards for each individual drain system in which waste is placed in accordance with 40 CFR 61.342(c)(1)(ii) [see section A.I.2.]:

[61.346(a)(1)]
i. The permittee shall install, operate, and maintain on each drain system opening a cover and closed-vent system that routes all organic vapors vented from the drain system to a control device.

i.(a) The cover shall meet the following requirements:

i.(a)(i) The cover and all openings (e.g., access hatches, sampling ports) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, initially and, thereafter, at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(a)(ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the drain system except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

i.(b) The closed-vent system and control device shall be designed and operated in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.].

**2.j** [61.346(b)(1-3)]
As an alternative to complying with 40 CFR 61.346(a) [see section A.I.2.], the permittee may elect to comply with the following requirements:

i. Each drain shall be equipped with water seal controls or a tightly sealed cap or plug.

ii. Each junction box shall be equipped with a cover and may have a vent pipe. The vent pipe shall be at least 90 cm (3 ft) in length and shall not exceed 10.2 cm (4 in) in diameter.

ii.(a) Junction box covers shall have a tight seal around the edge and shall be kept in place at all times, except during inspection and maintenance.

ii.(b) One of the following methods shall be used to control emissions from the junction box vent pipe to the atmosphere:

ii.(b)(i) Equip the junction box with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation. An example of such a system includes use of water seal controls on the junction box. A flow indicator shall be installed, operated, and maintained on each junction box vent pipe to ensure that organic vapors are not vented from the junction box to the atmosphere during normal operation.

ii.(b)(ii) Connect the junction box vent pipe to a closed-vent system and control device in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.].

iii. Each sewer line shall not be open to the atmosphere and shall be covered or enclosed in a manner so as to have no visual gaps or cracks in joints, seals, or other emission interfaces.

## 2. Additional Terms and Conditions (continued)

**2.k** STANDARDS: OIL-WATER SEPARATORS - 40 CFR Part 61, Subpart FF
[61.347(a)]
The permittee shall meet the following standards for each oil-water separator in which waste is placed in accordance with 40 CFR 61.342(c)(1)(ii) [see section A.I.2.]:

[61.347(a)(1)(i)]
i. The permittee shall install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the oil-water separator to a control device.

i.(a) The fixed-roof shall meet the following requirements:

i.(a)(i) The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(a)(ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the oil-water separator except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

[61.347(a)(1)(ii)]
i.(b) The closed-vent system and control device shall be designed and operated in accordance with the requirements of 40 CFR 61.349 [see sections A.I.2. and A.III.].

**2.l** STANDARDS: TREATMENT PROCESSES - 40 CFR Part 61, Subpart FF
[61.348(a)(1) through (5)]
The permittee shall treat the waste stream in accordance with the following requirements:

i. The permittee shall design, install, operate, and maintain a treatment process that removes benzene from the waste stream to a level less than 10 parts per million by weight (ppmw) on a flow-weighted annual average basis.

ii. Each treatment process shall be designed and operated in accordance with the appropriate waste management unit standards specified in this permit.

iii. For the purpose of complying with the requirements specified in 40 CFR 61.348(a)(1)(i) [see paragraph i. of this section], the intentional or unintentional reduction in the benzene concentration of a waste stream by dilution of the waste stream with other wastes or materials is not allowed.

iv. The permittee may aggregate or mix together individual waste streams to create a combined waste stream for the purpose of facilitating treatment of waste to comply with the requirements of 40 CFR 61.348(a)(1) [see paragraph i. of this section] except as provided in 40 CFR 61.348(a)(5) [see paragraph v. of this section].

v. If the permittee aggregates or mixes any combination of process wastewater, or product tank drawdown, together with other waste streams to create a combined waste stream for the purpose of facilitating management or treatment of waste in a wastewater treatment system, then the wastewater treatment system shall be operated in accordance with 40 CFR 61.348(b). These provisions apply to above-ground wastewater treatment systems as well as those that are at or below ground level.

## 2. Additional Terms and Conditions (continued)

**2.m** [61.348(c)]
The permittee shall demonstrate that each treatment process or wastewater treatment system unit, achieves the appropriate conditions specified in 40 CFR 61.348(a) [see section A.I.2.] or 40 CFR 61.348(b) in accordance with the following requirements:

i. engineering calculations in accordance with requirements specified in 40 CFR 61.356(e) [see section A.III.]; or

ii. performance tests conducted using the test methods and procedures that meet the requirements specified in 40 CFR 61.355 [see section A.V.].

**2.n** [61.348(f)]
The Administrator may request at any time for the permittee to demonstrate that a treatment process or wastewater treatment system unit meets the applicable requirements specified in 40 CFR 61.348(a) [see section A.I.2.] or 40 CFR 61.348(b) by conducting a performance test using the test methods and procedures as required in 40 CFR 61.355 [see sections A.V.].

**2.o** STANDARDS: CLOSED VENT SYSTEMS AND CONTROL DEVICES - 40 CFR Part 61, Subpart FF
[61.349(a)]
For each closed-vent system and control device used to comply with standards in accordance with 40 CFR 61.343 through 61.348 [see sections A.I.2. and A.III.], the permittee shall properly design, install, operate, and maintain the closed-vent system and control device in accordance with the following requirements:

[61.349(a)(1)]
i. The closed-vent system shall:

i.(a) Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(b) All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

i.(c) For each closed-vent system complying with 40 CFR 61.349(a) [see section A.I.2.], one or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

[61.349(a)(2)]
ii. The control device shall be designed and operated in accordance with the following conditions:

A vapor recovery system (e.g., a carbon adsorption system or a condenser) shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater, or shall recover or control the benzene emissions vented to it with an efficiency of 98 weight percent or greater.

**2.p** [61.349(b)]
Each closed-vent system and control device used to comply with this subpart shall be operated at all times when waste is placed in the waste management unit vented to the control device except when maintenance or repair of the waste management unit cannot be completed without a shutdown of the control device.

## 2. Additional Terms and Conditions (continued)

**2.q** [61.349(c)]
The permittee shall demonstrate that each control device, except for a flare, achieves the appropriate conditions specified in 40 CFR 61.349(a)(2) [see section A.I.2.] by using one of the following methods:

i. engineering calculations in accordance with requirements specified in 40 CFR 61.356(f) [see section A.III.]; or

ii. performance tests conducted using the test methods and procedures that meet the requirements specified in 40 CFR 61.355 [see section A.V.].

**2.r** [61.349(e)]
The Administrator may request at any time for the permittee to demonstrate that a control device meets the applicable conditions specified in 40 CFR 61.349(a)(2) [see section A.I.2.] by conducting a performance test using the test methods and procedures as required in 40 CFR 61.355 [see section A.V.] as appropriate.

**2.s** [61.350] STANDARDS: DELAY OF REPAIR - 40 CFR Part 61, Subpart FF
[61.350 (a)]
i. Delay of repair of facilities or units that are subject to the provisions of this subpart will be allowed if the repair is technically impossible without a complete or partial facility or unit shutdown.

[61.350(b)]
ii. Repair of such equipment shall occur before the end of the next facility or unit shutdown.

**2.t** DNF COMPRESSORS - 40 CFR Part 60, Subpart VV
[60.482-1(b)]
i. Compliance for the DNF compressors will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485 [see section A.V.].

[60.482-3(a)]
ii. 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 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and 40 CFR 60.482-3(i) [see section A.III.].

[60.482-3(b)]
iii. Each compressor seal system shall be:

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

iii.(b) Equipped with a barrier fluid system that is connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10; or

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

[60.482-3(c)]
iv. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.

**2.u** [60.482-9] DELAY OF REPAIR FOR EQUIPMENT LEAKS - 40 CFR Part 60, Subpart VV
[60.482-9(a)]
i. Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

[60.482-9(b)]
ii. Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** [40 CFR 63.647(c)] 40 CFR Part 63, Subpart CC
Each owner or operator required under 40 CFR Part 61, Subpart FF to perform periodic measurement of benzene concentration in wastewater, or to monitor process or control device operating parameters shall operate in a manner consistent with the minimum or maximum (as appropriate) permitted concentration or operating parameter values. Operation of the process, treatment unit, or control device resulting in a measured concentration or operating parameter value outside the permitted limits shall constitute a violation of the emission standards. Failure to perform required leak monitoring for closed vent systems and control devices or failure to repair leaks within the time period specified in 40 CFR Part 61, Subpart FF shall constitute a violation of the standard.

**2.** [61.346(a)] MONITORING FOR INDIVIDUAL DRAIN SYSTEMS - 40 CFR Part 61, Subpart FF

**2.a** [61.346(a)(2)]
Each cover seal, access hatch, and all other openings shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur and that access hatches and other openings are closed and gasketed properly.

**2.b** [61.346(a)(3)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

**3.** [61.346(b)(4)]
As an alternative, equipment installed in accordance with 40 CFR 61.346(b)(1), 40 CFR 61.346(b)(2) or 40 CFR 61.346(b)(3) [see section A.I.2.] shall be inspected as follows:

a. Each drain using water seal controls shall be checked by visual or physical inspection initially and thereafter quarterly for indications of low water levels or other conditions that would reduce the effectiveness of water seal controls.

b. Each drain using a tightly sealed cap or plug shall be visually inspected initially and thereafter quarterly to ensure caps or plugs are in place and properly installed.

c. Each junction box shall be visually inspected initially and thereafter quarterly to ensure that the cover is in place and to ensure that the cover has a tight seal around the edge.

d. The unburied portion of each sewer line shall be visually inspected initially and thereafter quarterly for indication of cracks, gaps, or other problems that could result in benzene emissions.

**4.** [61.346(b)(5)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal, gap, crack or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

**5.** [61.347] MONITORING REQUIREMENTS FOR OIL-WATER SEPARATORS - 40 CFR Part 61, Subpart FF

**5.a** [61.347(b)]
Each cover seal, access hatch, and all other openings shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur between the cover and oil-water separator wall and that access hatches and other openings are closed and gasketed properly.

**5.b** [61.347(c)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

## III. Monitoring and/or Record Keeping Requirements (continued)

**6.** [61.348(e)] MONITORING FOR TREATMENT PROCESSES - 40 CFR Part 61, Subpart FF

**6.a** If the treatment process or wastewater treatment system unit has any openings (e.g., access doors, hatches, etc.), all such openings shall be sealed (e.g., gasketed, latched, etc.) and kept closed at all times when waste is being treated, except during inspection and maintenance.

**6.b** Each seal, access door, and all other openings shall be checked by visual inspections initially and quarterly thereafter to ensure that no cracks or gaps occur and that openings are closed and gasketed properly.

**6.c** Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

**7.** [61.349] MONITORING FOR CLOSED VENT SYSTEMS AND CONTROL DEVICES - 40 CFR Part 61, Subpart FF

**7.a** [61.349(f)]
Each closed-vent system and control device shall be visually inspected quarterly. The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.

**7.b** [61.349(g)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], if visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed.

**7.c** [61.349(h)]
The permittee of a control device that is used to comply with the provisions of this section shall monitor the control device in accordance with 40 CFR 61.354(c) [see section A.III.].

**8.** [61.354] MONITORING OF OPERATIONS - 40 CFR Part 61, Subpart FF

**8.a** [61.354(a)(2)]
The permittee shall monitor each treatment process or wastewater treatment system unit to ensure the unit is properly operated and maintained by the following monitoring procedures:

Install, calibrate, operate, and maintain according to manufacturer's specifications equipment to continuously monitor and record a process parameter (or parameters) for the treatment process or wastewater treatment system unit that indicates proper system operation. The permittee shall inspect at least once each operating day the data recorded by the monitoring equipment (e.g., temperature monitor or flow indicator) to ensure that the unit is operating properly.

**8.b** [61.354(c)]
The permittee subject to the requirements in 40 CFR 61.349 [see section A.I.2. and A.III.] shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the control device operation as specified in the following paragraphs, unless alternative monitoring procedures or requirements are approved for that facility by the Administrator. The permittee shall inspect at least once each operating day the data recorded by the monitoring equipment (e.g., temperature monitor or flow indicator) to ensure that the control device is operating properly.

## III. Monitoring and/or Record Keeping Requirements (continued)

**8.c** [61.354(d)]
For a carbon adsorption system that does not regenerate the carbon bed directly on site in the control device (e.g., a carbon canister), either the concentration level of the organic compounds or the concentration level of benzene in the exhaust vent stream from the carbon adsorption system shall be monitored on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The device shall be monitored on a daily basis or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater. As an alternative to conducting this monitoring, the permittee may replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and either the organic concentration or the benzene concentration in the gas stream vented to the carbon adsorption system.

**9.** RECORD KEEPING REQUIREMENTS - 40 CFR Part 61, Subpart FF
[61.356(a)]
The permittee shall comply with the record keeping requirements of this section. Each record shall be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified.

**10.** [61.356(d)]
The permittee using control equipment in accordance with 40 CFR 61.343 through 61.347 [see sections A.I.2. and A.III.], shall maintain engineering design documentation for all control equipment that is installed on the waste management unit. The documentation shall be retained for the life of the control equipment. If a control device is used, then the permittee shall maintain the control device records required by 40 CFR 61.356(f) [see section A.III.].

**11.** [61.356(e)]
The permittee shall maintain the following records. The documentation shall be retained for the life of the unit.

a. A statement signed and dated by the permittee certifying that the unit is designed to operate at the documented performance level when the waste stream entering the unit is at the highest waste stream flow rate and benzene content expected to occur.

b. If engineering calculations are used to determine treatment process or wastewater treatment system unit performance, then the permittee shall maintain the complete design analysis for the unit. The design analysis shall include, for example, the following information: design specifications, drawings, schematics, piping and instrumentation diagrams, and other documentation necessary to demonstrate the unit performance.

c. If performance tests are used to determine treatment process or wastewater treatment system unit performance, then the permittee shall maintain all test information necessary to demonstrate the unit performance, including:

i. A description of the unit including the following information: type of treatment process; manufacturer name and model number; and for each waste stream entering and exiting the unit, the waste stream type (e.g., process wastewater, sludge, slurry, etc.), and the design flow rate and benzene content.

ii. Documentation describing the test protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the unit performance. The description of the test protocol shall include the following information: sampling locations, sampling method, sampling frequency, and analytical procedures used for sample analysis.

iii. Records of unit operating conditions during each test run including all key process parameters.

iv. All test results.

d. If a control device is used, then the permittee shall maintain the control device records required by 40 CFR 61.356(f) [see section A.III.].

## III. Monitoring and/or Record Keeping Requirements (continued)

**12.** [61.356(f)]
The permittee using a closed-vent system and control device in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.] shall maintain the following records. The documentation shall be retained for the life of the control device.

a. A statement signed and dated by the permittee certifying that the closed-vent system and control device are designed to operate at the documented performance level when the waste management unit vented to the control device is or would be operating at the highest load or capacity expected to occur.

b. If engineering calculations are used to determine control device performance in accordance with 40 CFR 61.349(c) [see section A.I.2.], then a design analysis for the control device that includes:

i. Specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the permittee, or the control device manufacturer or vendor that describes the control device design based on acceptable engineering texts.

ii. The design analysis shall address the following vent stream characteristics and control device operating parameters:

For a carbon adsorption system that does not regenerate the carbon bed directly on-site in the control device, such as a carbon canister, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level or the design exhaust vent stream benzene concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

c. If performance tests are used to determine control device performance in accordance with 40 CFR 61.349(c) [see section A.I.2.]:

i. A description of how it is determined that the test is conducted when the waste management unit or treatment process is operating at the highest load or capacity level. This description shall include the estimated or design flow rate and organic content of each vent stream and definition of the acceptable operating ranges of key process and control parameters during the test program.

ii. A description of the control device including the type of control device, control device manufacturer's name and model number, control device dimensions, capacity, and construction materials.

iii. A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.

iv. All test results.

**13.** [61.356(g)]
The permittee shall maintain a record for each visual inspection required by 40 CFR 61.343 through 61.347 [see sections A.I.2. and A.III.] that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

**14.** [61.356(h)]
The permittee shall maintain a record for each test of no detectable emissions required by 40 CFR 61.343 through 61.347 and 40 CFR 61.349 [see sections A.I.2. and A.III.]. The record shall include the following information: date the test is performed, background level measured during test, and maximum concentration indicated by the instrument reading measured for each potential leak interface. If detectable emissions are measured at a leak interface, then the record shall also include the waste management unit, control equipment, and leak interface location where detectable emissions were measured, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

## III. Monitoring and/or Record Keeping Requirements (continued)

**15.** [61.356(i)]
For each treatment process and wastewater treatment system unit operated to comply with 40 CFR 61.348 [see section A.I.2.], the permittee shall maintain documentation that includes the following information regarding the unit operation:

a. Dates of startup and shutdown of the unit.

b. If a process parameter is continuously monitored in accordance with 40 CFR 61.354(a)(2) [see section A.III.], the permittee shall maintain records that includes a description of the operating parameter (or parameters) to be monitored to ensure that the unit will be operated in conformance with these standards and the unit's design specifications, and an explanation of the criteria used for selection of that parameter (or parameters). This documentation shall be kept for the life of the unit.

c. Periods when the unit are not operated as designed.

**16.** [61.356(j)]
For each control device, the permittee shall maintain documentation that includes the following information regarding the control device operation:

a. Dates of startup and shutdown of the closed-vent system and control device.

b. A description of the operating parameter (or parameters) to be monitored to ensure that the control device will be operated in conformance with these standards and the control device's design specifications and an explanation of the criteria used for selection of that parameter (or parameters). This documentation shall be kept for the life of the control device.

c. Periods when the closed-vent system and control device are not operated as designed.

d. If a carbon adsorber is used, then the owner or operator shall maintain records from the monitoring device of the concentration of organics or the concentration of benzene in the control device outlet gas stream. If the concentration of organics or the concentration of benzene in the control device outlet gas stream is monitored, then the owner or operator shall record all 3-hour periods of operation during which the concentration of organics or the concentration of benzene in the exhaust stream is more than 20 percent greater than the design value.

e. If a carbon adsorber that is not regenerated directly on site in the control device is used, then the permittee shall maintain records of dates and times when the control device is monitored, when breakthrough is measured, and shall record the date and time when the existing carbon in the control device is replaced with fresh carbon.

**17.** DNF COMPRESSORS MONITORING - 40 CFR Part 60, Subpart VV
[60.482-3(d)]
Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.

**18.** [60.482-3(e)]
Each sensor shall be checked daily or shall be equipped with an audible alarm. The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, barrier fluid system, or both.

**19.** [60.482-3(f)]
If the sensor indicates failure of the seal system or barrier system, or both based on the criterion determined under 40 CFR 60.482-3(e) [see section A.III.], a leak is detected.

**20.** [60.482-3(g)]
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 40 CFR 60.482-9 [see section A.I.2.]. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

## III. Monitoring and/or Record Keeping Requirements (continued)

**21.** [60.482-3(i)]
Any compressor that is designated, as described in 40 CFR 60.486(e)(1) and (2) [see section A.III.], for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-3(a)-(h) [see sections A.I.2. and A.III.] if the compressor:

[60.482-3(i)(1)]
a. 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 40 CFR 60.485(c) [see section A.V.]; and

[60.482-3(i)(2)]
b. Is tested for compliance with 40 CFR 60.482-3(i)(1) [see section A.III.] annually, and at other times requested by the Administrator.

**22.** DNF COMPRESSOR RECORD KEEPING - 40 CFR Part 60, Subpart VV
[60.486(b)]
When each leak is detected as specified in 40 CFR 60.482-2, 40 CFR 60.482-3, 40 CFR 60.482-7, 40 CFR 60.482-8, and 40 CFR 60.483-2 [see sections A.I.2. and A.III.], the following requirements apply:

a. A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

b. The identification on equipment, may be removed after it has been repaired.

**23.** [60.486(c)]
When each leak is detected as specified in 40 CFR 60.482-2, 40 CFR 60.482-3, 40 CFR 60.482-7, 40 CFR 60.482-8, and 40 CFR 60.483-2 [see sections A.I.2. and A.III.], the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

a. The instrument and operator identification numbers and the equipment identification number.

b. The date the leak was detected and the dates of each attempt to repair the leak.

c. Repair methods applied in each attempt to repair the leak.

d. "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a) [see section A.V. (for compressors)] after each repair attempt is equal to or greater than 10,000 ppm.

e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

f. The signature of the permittee (or designate) whose decision it was that repair could not be effected without a process shutdown.

g. The expected date of successful repair of the leak if a leak is not repaired within 15 days.

h. Dates of process unit shutdown that occur while the equipment is unrepaired.

i. The date of successful repair of the leak.

## III. Monitoring and/or Record Keeping Requirements (continued)

**24.** [60.486(e)]
The following information pertaining to the DNF compressors shall be recorded in a log that is kept in a readily accessible location:

a. A list of identification numbers for equipment subject to the compressor requirements of this permit.

b. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-3(i) [see section A.III.].

c. The designation of equipment as subject to 40 CFR 60.482-3(i) [see section A.III.] shall be signed by the permittee.

d. The dates of each compliance test as required in 40 CFR 60.482-3(i) [see section A.III.].

e. The background level measured during each compliance test.

f. The maximum instrument reading measured at the equipment during each compliance test.

**25.** [60.486(h)]
The following information shall be recorded in a log that is kept in a readily accessible location:

a. Design criterion required in 40 CFR 60.482-3(e)(2) [see section A.III.] and explanation of the design criterion.

b. Any changes to this criterion and the reasons for the changes.

**26.** [60.486(j)]
Information and data used to demonstrate that a compressor is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

**27.** The permittee shall maintain the following monthly records:

a. the wastewater throughput as determined by measured flow rates;

b. the average benzene, ethylbenzene, toluene and xylene concentrations as determined from measured monthly concentrations (input parameters for the WATER8 model);

c. the monthly VOC emissions from each unit (dissolved nitrogen flotation unit and the activated sludge system);

d. the total hours of operation of each unit; and

e. the average hourly VOC emission rate from each unit (dissolved nitrogen flotation unit and the activated sludge system).

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

## IV. Reporting Requirements

**1.** REPORTING REQUIREMENTS - 40 CFR Part 63, Subpart CC
[40 CFR 63.654(a)]
The permittee shall comply with the recordkeeping and reporting provisions in 40 CFR 61.356 and 61.357 of 40 CFR Part 61, Subpart FF unless they are complying with the wastewater provisions specified in paragraph (o)(2)(ii) of 40 CFR 63.640. There are no additional reporting and recordkeeping requirements for wastewater under this subpart unless a wastewater stream is included in an emissions average.

## IV. Reporting Requirements (continued)

**2.** REPORTING REQUIREMENTS - 40 CFR Part 61, Subpart FF
[61.357(d)]
If the total annual benzene quantity from facility waste is equal to or greater than 10 Mg/yr, then the permittee shall submit to the Administrator and the Toledo Division of Environmental Services (TDOES) the following reports:

[61.357(d)(2)]
a. The permittee shall submit an annual report that updates the information listed in 40 CFR 61.357(a) [see paragraphs a.i. through a.iv. of this section]. If the information in the annual report required has not changed in the following year, the permittee may submit a statement to that effect.

i. Total annual benzene quantity from facility waste.

ii. A table identifying each waste stream and whether or not the waste stream will be controlled for benzene emissions.

iii. For each waste stream identified as not being controlled for benzene emissions, the following information shall be added to the table:

iii.(a) whether or not the water content of the waste stream is greater than 10 percent;

iii.(b) whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;

iii.(c) annual waste quantity for the waste stream;

iii.(d) range of benzene concentrations for the waste stream;

iii.(e) annual average flow-weighted benzene concentration for the waste stream; and

iii.(f) annual benzene quantity for the waste stream.

iv. The information required above should represent the waste stream characteristics based on current configuration and operating conditions. The permittee only needs to list in the report those waste streams that contact materials containing benzene. The report does not need to include a description of the controls to be installed to comply with the standard or other information required in 40 CFR 61.10(a).

## IV. Reporting Requirements (continued)

[61.357(d)(6)]
b. The permittee shall submit a quarterly certification that all of the required inspections have been carried out in accordance with the requirements of this permit.

[61.357(d)(7); (d)(7)(ii) and (d)(7)(iv)(D) and (H)]
c. The permittee shall submit a quarterly report that includes:

i. If a treatment process or wastewater treatment system unit is monitored in accordance with 40 CFR 61.354(a)(2) [see section A.III.], then each 3-hour period of operation during which the average value of the monitored parameter is outside the range of acceptable values or during which the unit is not operating as designed.

ii. For a control device monitored in accordance with 40 CFR 61.354(c) [see section A.III.], each period of operation monitored during which any of the following conditions occur, as applicable to the control device:

(a) Each 3-hour period of operation during which the average concentration of organics or the average concentration of benzene in the exhaust gases from a carbon adsorber, condenser, or other vapor recovery system is more than 20 percent greater than the design concentration level of organics or benzene in the exhaust gas.

(b) Each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified in 40 CFR 61.354(c) [see section A.III.].

[61.357(d)(8)]
d. The permittee shall submit an annual report that summarizes all inspections required by 40 CFR 61.342 through 61.354 [see sections A.I.2. and A.III.] during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about the repairs or corrective action taken.

**3.** [60.487(c)] REPORTING REQUIREMENTS - 40 CFR Part 60, Subpart VV
The permittee shall submit semiannual reports that include the following information:

a. Process unit identification.

b. For each month during the semiannual reporting period:

i. number of compressors for which leaks were detected as described in 40 CFR 60.382-3(f) [see section A.III.];

ii. number of compressors for which leaks were not repaired as required in 40 CFR 60.382-3(g) [see section A.III.]; and

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

c. Dates of process unit shutdowns which occurred within the semiannual reporting period.

d. Revisions to items reported in the initial semiannual report, if changes have occurred since the initial report or subsequent revisions to the initial report.

**4.** The permittee shall submit deviation (excursion) reports that identify all exceedences of the hourly limitations for VOC for the dissolved nitrogen flotation unit and the activated sludge system.

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

## IV. Reporting Requirements (continued)

**5.** The permittee shall also submit annual reports that specify the total VOC emissions from the dissolved nitrogen flotation unit and from the activated sludge system for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by review of facility records and results from tests and inspections using methods and procedures specified in sections A.V.2. through A.V.4.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

**2.** [61.355(c)] 40 CFR Part 61, Subpart FF
The permittee shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given below:

**2.a** [61.355(c)(1)]
The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:

i. The determination shall be made at the point of waste generation.

NOTE: The point of waste generation is at Sunoco MidAmerica Marketing and Refining, located at the same property address in Toledo, Ohio. It shall be Veolia's responsibility to obtain this information from Sunoco in order to demonstrate compliance with 40 CFR Part 61, Subpart FF. Sunoco's responsibility applies to sections A.V.2 and A.V.2.a through A.V.2.c which are listed here for reference purposes only.

The determination of flow-weighted annual average benzene concentration for process unit turnaround waste shall be made using either of the methods given in paragraph 2.b. or 2.c. of this section. The resulting flow-weighted annual average benzene concentration shall be included in the calculation of annual benzene quantity as provided in paragraph 2.a.iii. of this section for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process unit turnaround.

ii. Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.

iii. Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination to reduce the benzene concentration.

iv. The determination shall be made prior to any treatment of the waste that removes benzene, except as specified in paragraph 2.a.i. of this section.

**2.b** [61.355(c)(2)]
The permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the permittee shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the permittee and the Administrator do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under paragraph 2.c. of this section shall be used to resolve the disagreement.

## V. Testing Requirements (continued)

**2.c** [61.355(c)(3)]
Measurements of the benzene concentration in the waste stream in accordance with the following procedures:

i. Collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.

ii. For waste in enclosed pipes, the following procedures shall be used:

ii.(a) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.

ii.(b) A static mixer shall be installed in the process line or in a by-pass line unless the owner or operator demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.

ii.(c) The sampling tap shall be located within two pipe diameters of the static mixer outlet.

ii.(d) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.

ii.(e) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.

ii.(f) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 degrees C.

ii.(g) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.

ii.(h) The sample containers shall immediately be cooled and maintained at a temperature below 10 degrees C for transfer to the laboratory.

## V. Testing Requirements (continued)

iii. When sampling from an enclosed pipe is not feasible, a minimum of three representative samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of benzene prior to sampling.

iv. Each waste sample shall be analyzed using one of the following test methods for determining the benzene concentration in a waste stream:

iv.(a) Method 8020, Aromatic Volatile Organics, in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(b) Method 8021, Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photoionization and Electrolytic Conductivity Detectors in Series in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(c) Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(d) Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics: Capillary Column Technique in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(e) Method 602, Purgeable Aromatics, as described in 40 CFR Part 136, Appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA method; or

iv.(f) Method 624, Purgeables, as described in 40 CFR Part 136, Appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA method.

v. The flow-weighted annual average benzene concentration shall be calculated by averaging the results of the sample analyses using the equation in 40 CFR 61.355(c)(3)(v).

**3.** [61.355(d)]
The permittee using performance tests to demonstrate compliance of a treatment process with 40 CFR 61.348(a)(1)(i) [see section A.I.2.] shall measure the flow-weighted annual average benzene concentration of the waste stream exiting the treatment process by collecting and analyzing a minimum of three representative samples of the waste stream using the procedures in 40 CFR 61.355(c)(3) [see section A.V.]. The test shall be conducted under conditions that exist when the treatment process is operating at the highest inlet waste stream flow rate and benzene content expected to occur. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a test. The permittee shall record all process information as is necessary to document the operating conditions during the test.

## V. Testing Requirements (continued)

**4.** [61.355(h)]
The permittee shall test equipment for compliance with no detectable emissions as required in accordance with the following requirements:

a. Monitoring shall comply with 40 CFR Part 60, Appendix A, Method 21.

b. The detection instrument shall meet the performance criteria of Method 21.

c. The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.

d. Calibration gases shall be:

i. zero air (less than 10 ppm of hydrocarbon in air); and

ii. a mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.

e. The background level shall be determined as set forth in Method 21.

f. The instrument probe shall be traversed around all potential leak interfaces as close as possible to the interface as described in Method 21.

g. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared to 500 ppm for determining compliance.

**5.** [61.355(i)]
The permittee using a performance test to demonstrate compliance of a control device with either the organic reduction efficiency requirement or the benzene reduction efficiency requirement specified under 40 CFR 61.349(a)(2) shall use the following procedures:

a. The test shall be conducted under conditions that exist when the waste management unit vented to the control device is operating at the highest load or capacity level expected to occur. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a test. The owner or operator shall record all process information necessary to document the operating conditions during the test.

b. Sampling sites shall be selected using Method 1 or 1A from Appendix A of 40 CFR Part 60, as appropriate.

c. The mass flow rate of either the organics or benzene entering and exiting the control device shall be determined as follows:

i. The time period for the test shall not be less than 3 hours during which at least 3 stack gas samples are collected. Samples of the vent stream entering and exiting the control device shall be collected during the same time period. Each sample shall be collected over a 1-hour period (e.g., in a tedlar bag) to represent a time-integrated composite sample.

ii. A run shall consist of a 1-hour period during the test. For each run:

(a) The reading from each measurement shall be recorded;

(b) The volume exhausted shall be determined using Method 2, 2A, 2C, or 2D from Appendix A of 40 CFR Part 60, as appropriate;

(c) The organic concentration or the benzene concentration, as appropriate, in the vent stream entering and exiting the control shall be determined using Method 18 from Appendix A of 40 CFR Part 60.

## V. Testing Requirements (continued)

iii. The mass of organics or benzene entering and exiting the control device during each run shall be calculated as follows:

[See the equations in 40 CFR 61.355(i)(3)(iii)]

where:

Maj = Mass of organics or benzene in the vent stream entering the control device during run j, kg (lb).

Mbj = Mass of organics or benzene in the vent stream exiting the control device during run j, kg (lb).

Vaj = Volume of vent stream entering the control device during run j, at standard conditions, m3 (ft3).

Vbj = Volume of vent stream exiting the control device during run j, at standard conditions, m3 (ft3).

Cai = Organic concentration of compound i or the benzene concentration measured in the vent stream entering the control device as determined by Method 18, ppm by volume on a dry basis.

Cbi = Organic concentration of compound i or the benzene concentration measured in the vent stream exiting the control device as determined by Method 18, ppm by volume on a dry basis.

MWi = Molecular weight of organic compound i in the vent stream, or the molecular weight of benzene, kg/kg-mol (lb/lb-mole).

n = Number of organic compounds in the vent stream; if benzene reduction efficiency is being demonstrated, then n = 1.

K1 = Conversion factor for molar volume at standard conditions (293 K and 760 mm Hg (527 R and 14.7 psia)

= 0.0416 kg-mol/m3 (0.00118 lb-mol/ft3)

10 -6 = Conversion factor for ppmv.

## V. Testing Requirements (continued)

(iv) The mass flow rate of organics or benzene entering and exiting the control device shall be calculated as follows:

[See the equations in 40 CFR 61.355(i)(3)(iv)]

where:

Ea = Mass flow rate of organics or benzene entering the control device, kg/hr (lb/hr).

Eb = Mass flow rate of organics or benzene exiting the control device, kg/hr (lb/hr).

Maj = Mass of organics or benzene in the vent stream entering the control device during run j, kg (lb).

M bj = Mass of organics or benzene in the vent stream exiting the control device during run j, kg (lb).

T = Total time of all runs, hr.

n = Number of runs.

(d) The organic reduction efficiency or the benzene reduction efficiency for the control device shall be calculated as follows:

[See the equation in 40 CFR 61.355(i)(4)]

where:

R = Total organic reduction of efficiency or benzene reduction efficiency for the control device, percent.

Eb = Mass flow rate of organics or benzene entering the control device, kg/hr (lb/hr).

Ea = Mass flow rate of organic or benzene emitted from the control device, kg/hr (lb/hr).

**6.** DNF COMPRESSORS - 40 CFR Part 60, Subpart VV
[60.485(a)]
In conducting the performance tests required in 40 CFR Part 60, Subpart A, the permittee shall use as reference methods and procedures the test methods in 40 CFR Part 60, Appendix A or other methods and procedures as specified in this permit.

**7.** [60.485(b)]
The permittee shall determine compliance with the standards in section 60.482-3 [see section A.III] as follows:

a. Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used:

**7.a** i. zero air (less than 10 ppm of hydrocarbon in air); and

**7.b** ii. a mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm of methane or n-hexane.

**8.** [60.485(c)]
The permittee shall determine compliance with the no detectable emission standards in 40 CFR 60.482-3(i) [see section A.III.] as follows:

a. The requirements of 40 CFR 60.485(b) [see section A.V.] shall apply.

b. Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.

## V. Testing Requirements (continued)

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

**9.a** Emission Limitation for the dissolved nitrogen flotation unit:

11.15 lbs/hr of VOC
48.8 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations based on the wastewater throughput, as determined by the record keeping in section A.III.26, and an emission factor of 15.2 kg of VOC (33.5 lbs of VOC) per million gallons of wastewater (U.S. E.P.A. report, "VOC Emissions From Petroleum Refinery Wastewater Systems", dated 1985). An average hourly emission can be determined based on the above stated emission factor times the monthly throughput, and divided by the month's hours of operation from the record keeping requirements in section A.III.27.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-718)

**9.b** Emission Limitation for the activated sludge system:

5.70 lbs/hr of VOC
24.97 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations using U.S. EPA's WATER8 software, version 4.0, to determine annual VOC emissions from the activated sludge system along with the record keeping requirements of section A.III.27. An average hourly VOC emission rate can be determined by dividing the annual VOC emissions by the hours of operation per year and multiplying by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-718)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11011 (T105)

**Activity Description:** Tank 11011

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| internal floating roof storage tank with a capacity of 10,000 BBL - oily sludge tank | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b and A.I.2.c below. |
| | OAC rule 3745-21-09(L) | See A.I.2.d below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

**2. Additional Terms and Conditions (continued)**

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall maintain records of the following information:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

## III. Monitoring and/or Record Keeping Requirements (continued)

**2.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

**3.** [61.357(k)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**4.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11010 (T106)

**Activity Description:** Tank 11010 - Slop Oil Tank

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons) - slop oil tank | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b and A.I.2.c below. |
| | OAC rule 3745-21-09(L) | See A.I.2.d below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

**2. Additional Terms and Conditions (continued)**

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall maintain records of the following information:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

## III. Monitoring and/or Record Keeping Requirements (continued)

**2.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

**3.** [61.357(k)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**4.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11009 (T108)

**Activity Description:** Tank 11009 - Slop Oil Tank

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons) - slop oil tank | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b and A.I.2.c below. |
| | OAC rule 3745-21-09(L) | See A.I.2.d below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

**2. Additional Terms and Conditions (continued)**

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall maintain records of the following information:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

## III. Monitoring and/or Record Keeping Requirements (continued)

**2.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

**3.** [61.357(f)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**4.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11001 (T143)

**Activity Description:** Tank 11001

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 67,130 BBL internal floating roof storage tank - equilization tank | OAC rule 3745-31-05(A)(3) (PTI 04-717) | 1.65 tpy of volatile organic compounds (VOC) |
| | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below. |
| | OAC rule 3745-21-09(L) | See A.I.2.e below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

## 2. Additional Terms and Conditions (continued)

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** [40 CFR 63.640(n)(1)] Overlap of 40 CFR Part 63, Subpart CC with other regulations for storage vessels. A Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb, is required to comply only with the requirements of 40 CFR Part 60, Subpart Kb.

**2.e** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

**2.** [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**3.** [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

**4.** [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

**5.** The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

**6.** The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

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

## III. Monitoring and/or Record Keeping Requirements (continued)

**7.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

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

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa (0.754 psia).

**4.** The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

**5.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

**2.** Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**2.a** Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in sections A.III.5. and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11002 (T144)

**Activity Description:** Tank 11002

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 67,130 BBL internal floating roof storage tank - equiliazation tank | OAC rule 3745-31-05(A)(3) (PTI 04-717) | 1.65 tpy of volatile organic compounds (VOC) |
| | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below. |
| | OAC rule 3745-21-09(L) | See A.I.2.e below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

## 2. Additional Terms and Conditions (continued)

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** [40 CFR 63.640(n)(1)] Overlap of 40 CFR Part 63, Subpart CC with other regulations for storage vessels. A Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb, is required to comply only with the requirements of 40 CFR Part 60, Subpart Kb.

**2.e** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

**2.** [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**3.** [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

**4.** [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

**5.** The permittee shall maintain a record of the following:

a. volatile organic liquid (VOL) stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

**6.** The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

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

## III. Monitoring and/or Record Keeping Requirements (continued)

**7.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b
.
(Authority for term: OAC rule 3745-77-07(C)(1))

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa (0.754 psia).

**4.** The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

**5.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

**2.** Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**2.a** Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in sections A.III.5 and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11003 (T145)

**Activity Description:** Tank 11003

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 67,130 BBL internal floating roof storage tank - equilization tank | OAC rule 3745-31-05(A)(3) (PTI 04-717) | 1.65 tpy of volatile organic compounds (VOC) |
| | 40 CFR Part 61, Subpart CC | See A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below. |
| | OAC rule 3745-21-09(L) | See A.I.2.e below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

## 2. Additional Terms and Conditions (continued)

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** [40 CFR 63.640(n)(1)] Overlap of 40 CFR Part 63, Subpart CC with other regulations for storage vessels. A Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb, is required to comply only with the requirements of 40 CFR Part 60, Subpart Kb.

**2.e** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

**2.** [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**3.** [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

**4.** [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

**5.** The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

**6.** The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

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

## III. Monitoring and/or Record Keeping Requirements (continued)

**7.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

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

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa (0.754 psia).

**4.** The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

**5.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

**2.** Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**2.a** Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in sections A.III.5. and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Tank 11007 (T146)

**Activity Description:** Tank 11007

## A. State and Federally Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 357,000 gallon internal floating roof storage tank - oily sludge tank | OAC rule 3745-31-05(A)(3) (PTI 04-717) | 2.94 tpy of volatile organic compounds (VOC) |
| | 40 CFR Part 63, Subpart CC | See A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below. |
| | OAC rule 3745-21-09(L) | See A.I.2.e below. |

**2. Additional Terms and Conditions**

**2.a** WASTEWATER PROVISIONS - 40 CFR Part 63, Subpart CC
[63.647(a)]
The permittee of a Group 1 wastewater stream shall comply with the requirements of 61.340 through 61.355 of 40 CFR Part 61, Subpart FF for each process wastewater stream that meets the following definition:

Wastewater means water or wastewater that, during production or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product and is discharged into any individual drain system. Examples are feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics.

**2.b** [61.351] - Alternative Standards for Tanks - 40 CFR Part 61, Subpart FF
As an alternative to the standards for tanks specified in 40 CFR 61.343 of 40 CFR Part 61, Subpart FF, the permittee may elect to comply with a fixed roof and internal floating roof meeting the requirements in 40 CFR 60.112b(a)(1) of Subpart Kb.

## 2. Additional Terms and Conditions (continued)

**2.c** [61.351 --> 60.112b(a)(1)] 40 CFR Part 60, Subpart Kb
The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

iv. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

v. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

viii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ix. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

x. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**2.d** [40 CFR 63.640(n)(1)] Overlap of 40 CFR Part 63, Subpart CC with other regulations for storage vessels. A Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb, is required to comply only with the requirements of 40 CFR Part 60, Subpart Kb.

**2.e** The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 63, Subpart CC.

## II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

**1.** [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

**2.** [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**3.** [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

**4.** [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

**5.** The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L))

**6.** The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

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

## III. Monitoring and/or Record Keeping Requirements (continued)

**7.** All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

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

## IV. Reporting Requirements

**1.** [61.357(f)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

**2.** [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

**3.** [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa (0.754 psia).

**4.** The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

**5.** All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

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

## V. Testing Requirements

**1.** Compliance with 40 CFR Part 63, Subpart CC shall be determined by the monitoring and record keeping requirements specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CC)

**2.** Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**2.a** Emission Limitation:

2.94 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements specified in sections A.III.5. and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-717)

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

**1.** The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

**********

## THIS IS THE LAST PAGE OF THE PERMIT

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# Statement of Basis For Title V Permit

Submitted Nov. 21, 2005

| Part I - General | |
|---|---|
| Company Name | **Veolia Water North America Operating Services** |
| Premise Number | 0448020080 |
| What makes this facility a Title V facility? | Veolia (formerly TWO LLC/USFilter) manages the wastewater treatment plant for Sunoco R&M Inc. refinery in Toledo. It is situated on refinery property so their association and close proximity to the refinery makes it a T.V. facility subject to 40 CFR Part 63 subpart CC (Refinery MACT). |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)? | Yes |
| Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them. | See above. |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1) | N/A |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3) | N/A |
| Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | N/A |

| | |
|---|---|
| **Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)** | Since this source is subject to the Refinery MACT (40 CFR 63, subpart CC), all sources now reflect this rather than 40 CFR 61, subpart FF (Benzene Wastewater). The references for 40 CFR 61, subpart FF and 40 CFR 60, subpart Kb, are now replaced with 40 CFR 63, subpart CC which indirectly references the above two regulations. |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|---|---|---|
| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
| 1. | Y | N | **Basis**: OAC rule 3745-77-07(A)(13) - lists the insignificant sources |
| | | | |
| | | | |

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

| Part III (Requirements Within the State and Federally Enforceable Section) | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III. | | | | | | | | | | | | | | | |
| **EU(s)** | **Limitation** | **Basis** | | **ND** | **OR** | **M** | **St** | **ENF** | **R** | **St** | **Rp** | **St** | **ET** | **Misc** | **Comments** |
| | | **SIP (3745-)** | **Other** | | | | | | | | | | | | |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P001 | For facilities that have greater than or equal to 10 Mg/yr of benzene, the waste streams that contain benzene, must remove or destroy the benzene. | N | Y | N | N | Y | N | N | Y | N | Y | N | Y | N | **Basis:** 40 CFR 63, subpart CC (Refinery MACT) which allows compliance with 40 CFR 61 subpart FF - Benzene Waste Operations NESHAP |
| **EU(s)** | **Limitation** | **Basis** | | **ND** | **OR** | **M** | **St** | **ENF** | **R** | **St** | **Rp** | **St** | **ET** | **Misc** | **Comments** |
| | | **SIP (3745-)** | **Other** | | | | | | | | | | | | |
| P001 | The DNF cormpressors shall be equipped with a seal system that prevents leakage of VOC | N | Y | N | N | Y | N | N | Y | N | Y | N | Y | N | **Basis:** 40 CFR 60 subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries - Dissolved Nitrogen Floatation (DNF) compressors. The permittee needs to comply with the requirements of 40 CFR subpart VV for the DNF compressors, pursuant to 40 CFR 60.592(a). |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | VOC emissions are to be controlled from the wastewater separator by equipping the separator sections with covers and seals | Y | N | N | N | N | N | N | N | N | N | N | N | N | **M, R,RP & ET** - The permittee is required to control VOC emissions from the wastewater separator by equipping all forebay sections with covers and seals, which are to be kept in a closed position at all times except when in actual use. There are M, R, RP & ET in 40 CFR 61 subpart FF which relates to the API separator, drain systems, closed vent systems and control devices which are more stringent then the OAC rule. |
| | 11.15 lbs/hr VOC and 48.8 TPY VOC from the dissolved nitrogen floatation unit AND 5.70 lbs/hr VOC andd 24.97 TPY VOC from activated sludge system | N | Y | N | N | Y | N | N | Y | N | Y | N | Y | N | **Basis**: OAC rule 3745-31-05(A)(3), all requirements from PTI 04-718 have been transferred to the TV permit. |
| **EU(s)** | **Limitation** | **Basis** | | **ND** | **OR** | **M** | **St** | **ENF** | **R** | **St** | **Rp** | **St** | **ET** | **Misc** | **Comments** |
| | | **SIP (3745-)** | **Other** | | | | | | | | | | | | |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| T105, T106, T108, T143, T144, T145 & T146 | -------- | N | Y | N | N | Y | N | N | Y | N | Y | N | Y | N | **Basis:** 40 CFR 63, subpart CC allows compliance with 40 CFR 61 subpart FF - Benzene Waste Operations NESHAP which requires complying with 40 CFR 60 subpart Kb for tanks as stated in 40 CFR 63.647(a)(1) and 40 CFR 61.351.<br><br>The fixed roof tank shall be equipped with an internal floating roof. |
| | -------- | Y | N | N | N | N | N | N | N | N | N | N | N | N | **Basis:** OAC rule 3745-21-09(L). The emissions limitations and requirements established by this rule are equal to or less stringent than 40 CFR 63 subpart CC, so there are no M, R, RP & ET. |
| T143, T144, & T145 | Each tank: 1.65 TPY VOC | N | Y | N | N | Y | N | N | Y | N | Y | N | Y | N | **Basis**: OAC rule 3745-31-05(A)(3), all requirements from PTI 04-717 have been transferred to the TV permit. |
| | | | | | | | | | | | | | | | |

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

  - To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief

explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- **Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.**