Statement of Basis For Title V Permit

Company Name	BP Products North America Inc.
Premise Number	0448020007
What makes this facility a Title V facility?	Potential to emit > 100 tons/yr of CO, NOx, OC, PM, and SO2 and potential to emit > 25 tons/yr HAPs
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.	No

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.I.2.a	N	40 CFR 60 subpart A	NSPS General Provisions
A.I.2.b	N	40 CFR 61 subpart A	NESHAP General Provisions
A.I.2.c	N	40 CFR 63 subpart Z	MACT General Provisions
A.I.2.d	N	40 CFR 63 subpart CC	Refinery MACT General Provisions

A.I.2.g.i	21-09(T)		Leaks from refinery process equipment
A.I.2.e	N	40 CFR 60 subpart GGG	NSPS for equipment leaks from refinery process equipment
A.I.2.d.x and A.I.2.d.xii	N	40 CFR 63 subpart CC	MACT for petroleum refinery equipment leaks
A.I.2.d.xi	N	40 CFR 63 subpart CC	MACT for refinery storage vessels
A.I.2.d.iv	N	40 CFR 63 subpart CC	MACT for refinery miscellaneous process vents
A.I.2.g.ii	21-09(M)(3)	N	Control of emissions from process unit turnarounds
A.I.2.f.i	21-07(J)(2)	N	Emissions from waste gas flare system
A.I.2.f.ii	21-07(J)(3)	N	Emissions from emergency relief and vapor blowdown systems
A.I.2.g.iii	21-09(UU)(1)-(4)	N	VOC emissions controlled by smokeless flare
A.I.2.h	31-05(A)(3)	N	Coker 2 blowdown vented to smokeless flare
A.I.2.i	14-01	N	NOx Budget Trading Program
A.I.2.j	31-02(A)(2)	N	All heaters & boilers subject to NSPS subpart J

A.II.1	n	40 CFR 63 subpart CC	MACT for petroleum refineries
A.II.2	n	40 CFR 60 subpart VV	NSPS for Equipment leaks - referenced by 40 CFR Part 63 subpart CC and 40 CFR Part 60 subpart GGG
A.II.3	n	40 CFR 63 subpart H	MACT for equipment leaks - referenced by 40 CFR Part 63 subpart CC
A.II.4	N	40 CFR 61 subpart FF	NESHAP for benzene waste operations
A.II.5	21-09		Control of organic compounds from stationary sources
A.III.1	n	40 CFR 63 subpart CC	MACT for petroleum refineries
A.III.2	n	40 CFR 60 subpart VV	NSPS for equipment leaks - referenced by 40 CFR Part 63 subpart CC and 40 CFR Part 60 subpart GGG
A.III.3	n	40 CFR 63 subpart H	MACT for equipment leaks - referenced by 40 CFR Part 63 subpart CC
A.III.4	n	40 CFR 61 subpart FF	NESHAP for benzene waste operations
A.III.5	21-09	N	Control of volatile organic compounds from stationary sources
A.III.6	14-08	N	NOx Budget Trading Program

A.IV.1	n	40 CFR 63 subpart CC	Refinery MACT
A.IV.2	n	40 CFR 60 subpart VV	NSPS for equipment leaks - referenced by 40 CFR Part 63 subpart CC and 40 CFR Part 60 subpart GGG
A.IV.3	n	40 CFR 63 subpart H	MACT for equipment leaks - referenced by 40 CFR Part 63 subpart CC
A.IV.4	n	40 CFR 61 subpart FF	NESHAP for benzene waste operations
A.IV.5	21-09(T)	N	Refinery equipment leaks
A.IV.6	14-08	N	NOx Budget Trading Program
A.IV.7	40 CFR 63 subpart A	N	MACT General Provisions
A.IV.8	N	Clean Air Act section 112(j)	MACT Hammer Requirements

- **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 & 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		N D	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001	33.15 lbs/hr NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor daily fuel usage and calculate monthly & 12-month rolling emission rate. CAM is not applicable. ET - Test 6 months prior to renewal using Methods 1-4 and 7E.
B001	96.80 tons/yr NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor daily fuel usage and calculate monthly & 12-month rolling emission rate. CAM is not applicable. ET - Testing not required for annual limit
B001, B003, B004, B005, B006, B008, B009, B010, B014 - B020, B022, B029 - B032	20 % opacity	17-07	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor type of fuel burned. CAM is not applicable. ET - None required per Engineering Guide 16

B001, B003, B004, B005, B006, B008, B009, B010, B014 - B020, B022, B029-B032, P007	0.020 pound PE per mmBtu of heat input	17-10	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor type of fuel burned. CAM is not applicable. ET - None required per Engineering Guide 16
B001, B003, B004, B005, B006, B008, B009, B010, B014 - B020, B022, P007	H_2S concen-tration of fuel gas shall not exceed 0.10 grain /dscf as a rolling 3-hr average	31-02 (A)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel burned shall meet an as burned basis of 0.10 grain/dscf M - CEMS for fuel gas H_2S concentration. CAM is not applicable. ET -Not required per Engineering Guide 16
B006	42.0 lbs/hr NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor daily fuel usage and calculate monthly & 12-month rolling emission rate. CAM is not applicable. ET - Test 6 months prior to renewal using Methods 1-4 and 7E.
B006	122.64 tons/yr NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor daily fuel usage and calculate monthly & 12-month rolling emission rate. CAM is not applicable. ET - Testing not required for annual limit
B016	Fuel usage restricted to 262,800 mmBtu per rolling 12-month period	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel usage restricted to 262,800 mmBtu/rolling 12-month period M - Maintain records of monthly total firing rate and 12-month rolling summation of monthly firing rates. CAM is not applicable. ET - annual firing rate can not be tested

B019	262.8 tons/yr NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas, LP gas or refinery fuel gas can be burned M - Monitor daily fuel usage and calculate monthly & 12-month rolling emission rate. CAM is not applicable. ET - Testing not required for annual limit
B019	21.02 tons/yr SO2	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel burned shall meet an as burned basis of 0.10 grain/dscf M - H_2S CEMS. CAM is not applicable. ET - Testing is not required for an annual limit
B029	1.45 lbs/hr and 6.35 tons/yr CO	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	M, R & Rp - None required, since limit is based on potential to emit at 8760 hours/yr operation. CAM is not applicable. ET - None required per Engineering Guide 16
B029	1.60 lbs/hr and 6.99 tons/yr NOx	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	M, R & Rp - None required, since limit is based on potential to emit at 8760 hours/yr operation. CAM is not applicable. ET - None required per Engineering Guide 16
B029	0.15 lb/hr PE and 0.64 ton/yr PE	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas or refinery fuel gas can be burned M - Monitor type of fuel burned. CAM is not applicable. ET - None required per Engineering Guide 16
B029	2.53 tons/yr SO_2	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel burned shall meet an as burned basis of 0.10 grain/dscf M - CEMS for fuel gas H_2S concentration. CAM is not applicable. ET -Not required for an annual limit
B029	0.07 lb/hr and 0.29 ton/yr VOC	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	M, R & Rp - None required, since limit is based on potential to emit at 8760 hours/yr operation. CAM is not applicable. ET - None required per Engineering Guide 16
B029 - B032	0.10 grain /dscf as a rolling 3-hr average	N	40 CFR 60 subpart J	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel burned shall meet an as burned basis of 0.10 grain/dscf M - CEMS for fuel gas H_2S concentration. CAM is not applicable. ET -Not required per Engineering Guide 16

B030	3.66 lbs/hr and 16.06 tons/yr CO 4.03 lbs/hr and 17.66 tons/yr NOx 0.3 lb/hr and 1.31 tons/yr PE 0.17 lb/hr and 0.74 ton/yr VOC	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas or refinery fuel gas can be burned M - Monitor type of fuel burned. Allowable emissions are based on the potential emissions at 8760 hrs/yr. CAM is not applicable. ET - None required per Engineering Guide 16
B031	40 lbs CO/mmBtu and 4.2 lbs/hr CO 0.07 lb/mmBtu NOx and 9.1 lbs/hr NOx 1.7 lbs/mmscf and 0.2 lb/hr OC 2.5 lb/mmscf and 0.3 lb/hr PE	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only natural gas or refinery fuel gas can be burned M - Monitor type of fuel burned. Allowable emissions are based on the potential emissions at 8760 hrs/yr. CAM is not applicable. ET - Methods 1-4 and 7E for NOx . None required for CO, OC & PE per Engineering Guide 16
B031	2.8 lbs/hr SO_2	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Fuel burned shall meet an as burned basis of 0.10 grain/dscf M - CEMS for fuel gas H_2S concentration. CAM is not applicable. ET -Not required for an annual limit
B032	13.8 lbs/hr and 40.3 tons CO per rolling 12-month period	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Record quantity hourly and monthly average fuel gas firing rate; Calculate the monthly and 12-month rolling total CO emissions based on fuel usage. CAM is not applicable ET - None. Emissions are based on uncontrolled potential to emit at 8760 hours per year.
B032	24.15 lbs/hr and 70.52 tons NOx per rolling 12-month period	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Record quantity hourly and monthly average fuel gas firing rate; Calculate the monthly and 12-month rolling total NOx emissions based on fuel usage. CAM is not applicable ET - Methods 1-4 and 7E for NOx .

B032	1.04 lbs/hr and 3.02 tons PE per rolling 12-month period	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only refinery fuel gas or natural gas may be burned M - Record quantity hourly and monthly average fuel gas firing rate; Calculate the monthly and 12-month rolling total PE emissions based on fuel usage. CAM is not applicable ET - Not required per Engineering Guide 16
B032	20.46 tons SO2 per rolling 12-month period	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Only refinery fuel gas or natural gas with a maximum H2S concentration of 0.10 gr/dscf may be burned M - H_2S CEMS. Record quantity hourly and monthly average fuel gas firing rate; Calculate the monthly and 12-month rolling total SO2 emissions based on fuel usage. CAM is not applicable ET - Not required per Engineering Guide 16
B032	0.59 lb/hr and 1.71 tons VOC per rolling 12-month period	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Record quantity hourly and monthly average fuel gas firing rate; Calculate the monthly and 12-month rolling total VOC emissions based on fuel usage. CAM is not applicable ET - Not required per Engineering Guide 16
F001	No VE's for 6-minutes in any 60-minutes from paved roadways/parking areas	17-07(B)(4)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F001	Reasonably available control measures	17-08(B), (B)(8), (B)(9)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F001	No VE's for 13-minutes in any 60-minutes from unpaved roadways/parking areas	17-07(b)(5)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16

F001	Reasonably available control measures	17-08(B), (B)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F004	20 % opacity as a 3-minute average	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F004	Reasonably available control measures	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F005, F006	20% opacity as a 3-minute avg. best available control measures	17-07(B)(1), -31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16
F005	5.02 tons/yr PE, 5.02 tons/yr PM_{10} as a rolling 12-month summation	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Maintain records of tons of coke handled and calculate monthly emissions and 12-month rolling summation of monthly emissions of PE. ET - None required per Engineering Guide 16
F006	1.86 tons/yr PE and 1.86 tons/yr PM_{10} as a rolling 12-month summation	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Maintain records of tons of coke handled and calculate monthly emissions and 12-month rolling summation of monthly emissions of PE. ET - None required per Engineering Guide 16
F006	20% opacity as a 3-minute avg. best available control measures	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Weekly inspections to determine need for implementing control measure. CAM is not applicable ET - None required per Engineering Guide 16

J001	6.60 tons/yr VOC	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Gasoline throughput shall not exceed 20,000 gallons per day and shall only be supplied from internal floating roof tanks. M - Maintain records of daily & gasoline throughput and vapor pressure of each liquid loaded. CAM is not applicable. ET - Not required per Engineering Guide 16
J001, Z034	Gasoline throughput shall not exceed 20,000 gal/day	21-09(Q)	40 CFR 63 subpart R	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Gasoline throughput shall not exceed 20,000 gallons per day and shall only be supplied from internal floating roof tanks. M - Maintain records of daily gasoline throughput. CAM is not applicable. ET - Not applicable to throughput limitation
J005, P017, P028, P029, P036, P037, P802	Requirements for emissions units subject to 40 CFR 60 subpart GGG	N	40 CFR 60 subpart GGG	N	N	Y	N	N	Y	N	Y	N	N	N	M - The monitoring requirements for equipment leaks subject to 40 CFR Part 60 subpart GGG are contained in Part II of this permit. CAM is not applicable. ET - Emission testing is a part of the leak detection and repair equipment leak monitoring requirements using Method 21 of 40 CFR Part 60, Appendix A

J001, J004, J005, Z034, P007, P009, P010 P011, P013, P014, P017, P019-P023, P025, P028, P029, P036, P037, P802, Z001, Z002, Z006, Z017, Z018, Z032, Z033, Z035	LDAR requirements for petroleum refinery equipment leaks	21-09(T)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitoring requirements for equipment leaks are contained in PART II of the permit referencing OAC rule 3745-21-09(T). CAM is not applicable. ET - Emission testing is a part of the leak detection and repair equipment leak monitoring requirements using Method 21 of 40 CFR Part 60, Appendix A.

J001, J005, Z034, P007, P009, P010 P011, P013, P014, P017, P019-P023, P025, P028, P029, P036, P037, P802, Z001, Z002, Z006, Z017, Z018, Z032, Z033, Z035	Petroleum refinery equipment leaks suject to 40 CFR Part 63 subpart CC	N	40 CFR 63 subpart CC	N	N	Y	N	N	Y	N	Y	N	N	N	M - The monitoring requirements for equipment leaks are contained in Part II of the permit referencing the LDAR requirements of 40 CFR 63.648. CAM is not applicable. ET - Emission testing contained in Part II of the permit is a part of the equipment leak monitoring requirements using Method 21 of 40 CFR Part 60, Appendix A.
J004	None	N	40 CFR 63 subparts Y and CC	Y	N	N	N	N	N	N	N	N	N	N	ND - This unit is exempt from the requirements of 40 CFR 63 subpart CC, in accordance with 63.640(c)(6), becaues the emissions unit does not meet the applicability criteria of 40 CFR Part 63 subpart Y. This unit is exempt from the requirements of 40 CFR Part 63 subpart Y, because the potential to emit of each HAP and total HAP does not exceed 10 tons/yr and 25 tons/yr respectively.
J005	3.2 tons VOC per rolling 12-month period	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Throughput shall not exceed 51,240,000 gallons per year. M - Maintain monthly loading rate and 12-month summation of monthly loading rates. CAM is not applicable. ET - Not required for annual emission limits.
P007	500 ppmvd CO	31-02(A)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Process analyzer for monitoring CO emissions. CAM is not applicable ET - Not required per Engineering Guide 16

P007	1 lb PE/1000 lb coke burned	31-02(A)(2)	40 CFR 63 subpart UUU	N	Y	Y	N	N	Y	N	Y	N	Y	N	M - Opacity, SO2 and & CO monitors as required by 40 CFR 63.1572(a). CAM is not applicable. ET - Initial test as required by 40 CFR 63.1564(b) and the options under Table 4 of 40 CFR Part63 subpart UUU.
P007	91.7 lb/hr PE	17-11(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Continuous opacity monitor. CAM is not applicable. ET - Every 2.5 years using Methods 1-5. Performance testing on September 27, 1997 using Methods 1-4 and 5 demonstrated emissions were 73.3 pounds per hour of particulate emissions.
P007	0.92 lbs of SO2 per 1000 lbs of fresh feed	18-54(W)(6)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Continuous SO2 monitor. CAM is not applicable. ET - Test every 2.5 years. Performance testing on May 14, 2002 using Methods 1-4 and 6C of 40 CFR Part 60, Appendix A demonstrated an emission rate of 0.143 lb SO2/1000 lbs fresh feed.
P007	Metal HAP limits Table 1 of 40 CFR Part 63 subpart UUU	N	40 CFR Part 63 subpart UUU	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Table 2 of 40 CFR Part 63 subpart UUU M - See Tables 40 and 41 of 40 CFR Part 63 subpart UUU. CAM is not applicable. ET - Initial test as required by 40 CFR 63.1564(b) and the options under Table 4 of 40 CFR Part63 subpart UUU.
P007	Organic HAP limits in Table 8 of 40 CFR Part 63 subpart UUU	N	40 CFR Part 63 subpart UUU	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - See Table 9 of 40 CFR Part 63 subpart UUU M - See tables 40 and 41 of 40 CFR Part 63 subpart UUU. CAM is not applicable. ET - Initial testing according to 40 CFR 63.1571 and Table 11 of 40 CFR Part 63 subpart UUU.
P007	HAP Emissions from Bypass Lines	N	40 CFR Part 63 subpart UUU	N	N	Y	N	N	Y	N	Y	N	N	N	M - Comply with the work practice standards in Table 36 of 40 CFR Part 63 subpart UUU. CAM is not applicable. ET - Initial testing according to 40 CFR 63.1569(b)

P009, P037	Re-route sulfur pit emissions such that they are treated & monitored routed to	31-02(A)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Continuous SO2 monitor ET - Annual RATA using Method 6
P009, P037	250 ppmd SO2 at 0% excess air	N	40 CFR 60 subpart J & 40 CFR Part 63 subpart UUU	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Continuous SO2 monitor ET - Annual RATA using Method 6
P009, P037	HAP emissions from bypass lines	N	40 CFR 63 subpart UUU	N	N	Y	N	N	Y	N	Y	N	Y	N	OR - Develop & implement an operational and maintenance plan according to 40 CFR 63.157. M - Comply with one of the options under Table 36 of 40 CFR Part 63 subpart UUU. CAM sis not applicable. ET - Testing as required by 40 CFR 63.1569(b).
P010	647 lbs/hr SO_2	18-06(E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Monitor daily gas flow rate and H2S concentration of vent gas, operating time of control device (B019), hourly and daily SO2 emission rate. CAM is not applicable. ET - Test using Methods 1-4 and 6 within 6 months of permit issuance.
P010	control the emissions from the vacuum producing system by piping the vapors to be burned in the Crude/Vac 2 Furnace (B019)	21-09(M)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - monitor operating time of control system (B019), monitor period of time emissions not routed to B019, monitor vent gas flow rate, record emissions occurring when B019 is bypassed. CAM is not applicable. ET - Not required per Engineering Guide 16.

P010, P011, P017, P021-P023, P028, P029, P036, Z001, Z006	Miscellaneous Process Vents subject to 40 CFR Part 63 subpart CC	N	40 CFR 63 subpart CC	N	N	Y	N	N	Y	N	Y	N	Y	N	M - The monitoring requirements for equipment leaks are contained in Part II of the permit referencing the monitoring requirements of 40 CFR 63.643 and 63.644. CAM is not applicable. ET - The emission testing requirements for miscellaneous proces vents subject to 40 CFR Part 63 subpart CC are contained in Part II of the permit and reference the test methods and procedures identified under 40 CFR 63.645. All Group 1 Miscellaneous Process Vents are controlled by refinery flares. The refinery flares are required to be tested every 2.5 years using the procedures specified under OAC rule 3745-21-09(10)(P) and Method 22 of 40 CFR Part 60, Appendix A.
P011	1456 lb/hr SO_2	18-06(E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Monitor daily gas flow rate and H2S concentration of vent gas, operating time of control device (B019), hourly and daily SO2 emission rate. CAM is not applicable. ET - Test using Methods 1-4 and 6 within 6 months of permit issuance.
P011	control emissions by piping the vapors to the Crude 1 Furnace (B015)	21-09(M)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - monitor operating time of control system (B019), monitor period of time emissions not routed to B019, monitor vent gas flow rate, record emissions occurring when B019 is bypassed. CAM is not applicable. ET - Not required per Engineering Guide 16.
P011	4.47 tons/yr SO_2 per rolling 12-month period	31-05(D)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor daily gas flow rate and H2S concentration of vent gas, operating time of control device (B019), hourly and daily SO2 emission rate and 12-month rolling summation of SO2 emissions. CAM is not applicable. ET - Not required for an annual limit

P017	The blowdown drum shall be vented to a flare that complies with OAC 3745-21-09(DD)(10)(d)	21-09(UU)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor operating time of emissions unit and control equipment, and monitor number of coking cycles. CAM is not applicable. Refer to Part II of permit for flare monitoring requirements. ET -
P019, P020	Tables 15, 16 and 36 of 40 CFR Part 63 subpart UUU	N	40 CFR 63 subpart UUU	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - See Tables 15, 16 and 23 of 40 CFR Part 63 subpart CC. M - Monitoring per 40 CFR 63.1566(b)(1) and 40 CFR 63.1567(b)(1). ET - Initial performance test according to 40 CFR 63.1571 and Tables 18 and 25 of 40 CFR Part 63 subpart UUU.
P021, P022, P023	blowdown drum vented to a flare that complies with OAC 3745-21-09(DD)(10)(d)	21-09(UU)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor operating time of emissions unit and control equipment. CAM is not applicable. Refer to Part II of permit for flare monitoring requirements. ET - Refer to Part II of permit for flare testing requirements.
P025	equip all forebay sections and other separator sections with covers and seals	21-09(M)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Quarterly visual inspections to ensure all covers and forebay and separator sections are equipped with lids and seals and kept in a closed position, except when in actual use. ET - There is no emission limit to test
P025	Process wastewater from the crude desalter shall be discharged to a steam stripper with vented to a flare	21-09(UU)4)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Maintain daily records of the capture system, control device and crude desalter ET - Refer to Part II of the permit for flare emission testing requirements

P025	Manage and treat benzene waste containing at least 10% water, except for a maximum of 6Mg uncontrolled benzene emissions	N	40 CFR 61 subpart FF, 40 CFR 63 subpart CC	N	N	Y	N	N	Y	N	Y	N	Y	N	M - The permittee has chose to control benzene according to the alternative under 40 CFR 61.342(e). Quarterly inspections for to ensure affected covers, seals and acces hatches are closed and gasketed. Quarterly inspections of drain water-seal controls. Quarterly inspections of closed-vent system and control devices ductwork & piping for evidence of holes or loose connections. Monthly measurement of benzene concentration of wastewater exiting the benzene strippers. Continuous monitoring/recording of a process parameter(s) that indicate proper operation of the benzene strippers. Monitor benzene vapor concentration exiting affected carbon canisters at no greater than 20% of the design carbon replacement interval. Monthly visual inspection of any bypass lines to ensure valve is maintained in a closed position. ET - The permittee is required to
P025	Manage group II wastewater streams according to requirements of 40 CFR 60 subpart QQQ	N	40 CFR 60 subpart QQQ	N	N	Y	N	N	Y	N	Y	N	N	N	[Note - Group 1 streams subject to NSPS QQQ only need to comply with MACT CC] M - Monthly inspect affected drains for presence of water seal control. Inspect junction boxes semiannually for presence of cover with tight seal. Inspect unburies sewer lines semiannually for presence of cracks or gaps. Semi-annual inspection of oil/water separators for broken seal or gaskets. ET - None.
P025	Requirements for Miscellaneous Process Vents under 40 CFR Part 63 subpart CC	N	40 CFR 63 subpart CC	N	N	Y	N	N	Y	N	Y	N	Y	N	M - The M, R, Rp and ET for miscellaneous process vents subject to 40 CFR Part 63 subpart CC are contained in Part II of the permit.

P028	22.03 tons/yr VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee is required to monitor for equipment leaks according to 40 CFR Part GGG. ET - There is no testing required for an annual limit
P028, P029	Requirements for individual drains subject to 40 CFR 60 subpart QQQ	N	40 CFR 60 subpart QQQ	N	N	Y	N	N	Y	N	Y	N	N	N	M - See P025 for monitoring requirements. ET - None. The M, R, and Rp requirements for P025 are used to demonstrate compliance.
P029	19.11 tons/yr VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee is required to monitor for equipment leaks according to 40 CFR Part GGG. ET - There is no testing required for an annual limit
P036	7.38 lbs/hr VOC from coke cutting	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Blowdown emissions shall be vented to the flare gas recovery system. M - Daily records of hours of operation and number of coking cycles. Calculate the following emissions from coke cutting: total daily VOC emissions, hourly VOC emissions as a rolling 30-day average, the monthly VOC emissions, and the rolling 12-month summation of VOC emissions. ET - None required per Engineering Guide 16
P036	12.12 tons of VOC emissions per rolling, 30-day period (from coke cutting);	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Blowdown emissions shall be vented to the flare gas recovery system. M - Daily records of hours of operation and number of coking cycles. Calculate the following emissions from coke cutting: total daily VOC emissions, hourly VOC emissions as a rolling 30-day average, the monthly VOC emissions, and the rolling 12-month summation of VOC emissions. ET - Not required for annual limit

P037	2.7 lbs/hr CO and 8.07 tons/yr CO as a rolling, 12-month summation 4.4 lbs/hr NOx and 12.76 tons/yr NOx as a rolling, 12-month summation 0.6 lb/hr particulate emissions (PE) and 1.74 tons/yr particulate emissions as a rolling, 12-month summation 172 tons/yr SO2 as a rolling, 12-month summation 6.2 tons/yr VOC as a rolling, 12-month summation (from fugitive equipment leaks)	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET The allowable emission rates are based on operating at maximum capacity for 8760 hours per year, therefore, M, R, Rp, and ET are not required to demonstrate compliance with these limits.

P802	0.23 pound per hour and 1.0 ton per year of volatile organic compounds (VOC) stack emissions	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - monitor the carbon canister(s) according to one of the following options. a. The permittee shall monitor the concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption system, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The exhaust shall be monitored at intervals no greater than 20 percent of the design carbon replacement interval; or b. The permittee shall replace the carbon in the carbon adsorption system with fresh carbon at a regular pre-determined interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and organic concentration in the gas stream vented to the carbon adsorption system. ET - Not required per Engineering Guide 16. Pre-survey sampling by the permittee on October 25, 1996 using Method 18 of 40 CFR Part 60, Appendix A, resulted in no detectable emissions at a detection limit of 50 ppm, while the permit allowable emission rate was based on 264 ppm.

Z006	VOC emissions from the SPOP waterwash tower spentwash flash drum and the POLY waterwash spentwash flash drum shall be vented to a flare that complies with the requirements of OAC rule 3745-21-09(DD)(10)(d)	21-09(UU)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - See Part II of this permit for the monitoring requirements. The permittee shall continuously monitor for the presence of a flame, CAM is not applicable. ET - See Part II Section V for the testing requirements. The permittee shall perform testing every 2.5 years according to the requirements of OAC rule 3745-21-10(P)(2) and (3), and Method 22 of 40 CFR Part 60, Appendix A.
Z017, Z018	20% opacity as a 6-minute average	21-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Burn only diesel fuel in this unit M - For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16
Z017, Z018	PE shall not exceed 0.310 pound per million Btu of actual heat input	17-11(B)(5)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Burn only diesel fuel in this unit M - For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16
Z017, Z018, Z035	none	OAC Rule 3745-18-06(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Stationary internal combustion engines which have rated heat input capacities equal to, or less than, ten million BTU per hour total rated capacity are exempt from OAC rule 3745-18-06(G).

Z035	20% opacity as a 6-minute average	21-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Burn only gasoline fuel in this unit M - For each day during which the permittee burns a fuel other than gasoline fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16
Z035	PE shall not exceed 0.310 pound per million Btu of actual heat input	17-11-(B)(5)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Burn only gasoline fuel in this unit M - For each day during which the permittee burns a fuel other than gasoline fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16
T010 - T014, T051, T074	State storage vessel requirements for internal floating roof tanks	21-09(L)	N	N	N	N	N	N	N	N	N	N	N	N	The tank shall be equipped with an internal floating roof. Automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling. M,R,Rp - None required for the above state requirements. CAM is not applicable. ET - None required for the above state requirements

T010 - T014, T045, T046, T051, T074	Group 1 storage vessels shall comply with the requirements of 40 CFR 63.119 through 63.121 (subpart G) except as provided in 63.646(b) through 63.646(l) of subpart CC.	N	40 CFR 63.646	Y	N	Y	N	N	Y	N	Y	N	N	N	OR - 40 CFR 63.646(f) and (f)(1)-(3) M - 40 CFR 63.120, except for 40 CFR 63.646(e). CAM is not applicable ET - None required. These requirements do not establish an emission limitation that can be tested.

T015, T047, T052, T053, T055, T056, T058, T063, T064, T066, T067, T075 - T083, T086 - T089, T092, T093, T099 - T101, T106 - T111, T113- T116 T122, Z008, Z011, Z013 - Z015, Z019	No person shall place, store, or hold in a fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, unless such tank, is designed or equipped with vapor control equipment which is one of the following: an internal floating roof; or, alternative equivalent control for VOC emissions as may be approved by the Director of Ohio EPA	21-09(L)	N	N	N	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute. M - maintain records of the storage vessel's group designation for each stored material, an identification of each stored material, the average annual weight percent of HAP of each stored material, the maximum true vapor pressure and average annual true vapor pressure of each stored material, in psia. CAM is not applicable. ET - None required. There is no emission limitation to test.
T047	Requirements of 40 CFR Part 60 subpart Ka	N	40 CFR 60 subpart Ka	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(7), a Group 2 storage vessel that is subject to the provisions of 40 CFR Part 60, subpart Ka, but not to the control requirements of Ka, is required to only comply with the provisions of 40 CFR Part 63, subpart CC.

Z007, T139	State fixed roof storage vessel requirements	21-09(L)	N	Y	N	Y	N	N	Y	N	Y	N	N	N	ND - Exempt from 3745-21-09(L), since tank size is less than 40,000 gallons. M - maintain records of the storage vessel's group designation for each stored material, an identification of each stored material, the average annual weight percent of HAP of each stored material, the maximum true vapor pressure and average annual true vapor pressure of each stored material, in psia. CAM is not applicable. ET - None required. There is no emission limitation to test.
T015, T047, T052, T053, T055, T056, T058, T063, T064, T066, T067, T075 - T083, T086 - T089, T092, T093, T099 - T101, T106 - T111, T122, Z008, Z011, Z013 - Z015, Z019	The permittee shall not store an organic liquid material with a maximum true vapor pressure greater than or equal to 10.4 kpa (1.51 psia), and store an organic liquid material with an average annual true vapor pressure greater than or equal to 8.3 kpa (1.21 psia), and store an organic liquid material with an average annual HAP concentration greater than 4%, by weight, as total organic HAP.	N	40 CFR Part 63.641 must not meet the definition of a Group 1 tank	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records of the storage vessel's group designation for each stored material, an identification of each stored material, the average annual weight percent of HAP of each stored material, the maximum true vapor pressure and average annual true vapor pressure of each stored material, in psia, and the storage vessel's dimensions, and an analysis showing the capacity of the vessel. CAM is not applicable. ET - None required. There is no emission limitation to test.

Z007, Z009, Z012	Definition of group status under 40 CFR 63.641.	N	40 CFR 63.646	Y	N	N	N	N	N	N	N	N	N	N	ND - The design storage capacity of this storage vessel is less than 177 cubic meters (46, 763 gallons) and is defined as a Group 2 storage vessel under 40 CFR 63.641. Therefore, it is exempt from the requirements of 40 CFR Part 63 subpart CC.
Z009, Z012	No person shall place, store, or hold in a fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, unless such tank, is designed or equipped with vapor control equipment which is one of the following: an internal floating roof; or, alternative equivalent control for VOC emissions as may be approved by the Director of Ohio EPA	21-09(L)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute. M - Maintain records of: the types of petroleum liquids stored in the tank; and, 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 pounds per square inch absolute. CAM is not applicable. ET - None required. There is no emission limitation to test.

T016 - T021, T024 - T041, T044, T059 - T061, T072, T073, T084, T085, T090, T091, T096, T097	i. There shall be no visible holes, tears or other openings in the seal or seal fabric. ii. For the primary seal, the total seal gap area shall not exceed 1.0 square inch per foot of tank diameter. iii. For the secondary seal, the total seal gap area shall not exceed 1.0 square inch per foot of tank diameter.	21-09(Z)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Annual visual inspections, annual secondary seal inspections, measure primary seal gap every 5 years, CAM is not applicable. ET - None required. This requirement does not contain an emission limit to test.

T016 - T021, T024 - T041, T044, T059 - T061, T072, T073, T084, T085, T090, T091, T096, T097, T120, T166, T167, T174	State storage vessel requirements for external floating roof tanks	21-09(Z)	N	N	N	N	N	N	N	N	N	N	N	N	Any opening in the external floating roof, except automatic bleeder vents, rim space vents, leg sleeves, stub drains and slotted gauging/sampling wells, shall be equipped with a projection into the tank below the liquid surface. Emergency roof drains equipped with a device which covers at least 90 percent of the opening. Stub drains shall be equipped with a projection below the liquid surface. Slotted gauging/sampling wells equipped with an object which floats on the liquid surface within the well and which covers at least 90 percent of the area of the well opening. M,R,Rp - None required by for the above state requirements. CAM is not applicable. ET - None required. The above state requirements do not have an applicable emission limitation.

T016 - T021, T024 - T041, T044, T059 - T061, T072, T073, T084, T085, T090, T091, T096, T097, T102, T120	Requirements of 40 CFR Part 63 subpart CC	N	40 CFR 63.646	N	N	Y	N	N	Y	N	Y	N	N	N	OR - While operating in Group 1 service: a. Covers or lids on a floating roof shall remain closed, except when in use. b. Rim space vents are to be set to open only when the floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. c. Automatic bleeder vents 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. The external floating roof shall be equipped with a closure device. i. Except as provided in 40 CFR 63.119(c)(1)(iv), the closure device is to consist of two seals. ii. Except as provided in 40 CFR 63.119(c)(1)(v), the primary seal shall be either a metallic shoe seal or a liquid-mounted seal. iii. Except during the inspections required by 40 CFR 63.120(b), both the primary seal and the secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion. iv. The external floating roof shall be floating on the liquid surface at all times except when the floating roof must be supported by the leg supports during the periods specified below: i. during the initial fill; ii. after the vessel has been completely emptied and degassed; and iii. when the vessel is completely emptied before being subsequently refilled. c. When roof is resting on the leg supports, filling, emptying, or refilling shall be continuous and shall be accomplished as soon as practical. 3. Primary seal Additional requirements: a. One end of the metallic shoe shall extend into the liquid and the other end shall extend a minimum vertical distance of 61 centimeters above the stored liquid surface. b. There shall be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope. 4. Secondary seal shall meet the additional requirements specified below: a. The secondary seal shall completely cover the space between the roof edge and the vessel wall. b. There shall be no holes, tears, or other openings in the seal or seal fabric. M - Annual seal and seal fabric shall be inspection. Annual secondary seal gap shall be measurement. The primary seal gap shall be measured at least once every 5 year. CAM is not applicable. ET - None required. This requirement has not emission limit to test.

T120	Requirements of 40 CFR Part 60 subpart Ka and State BAT	31-05(A)(3)	40 CFR 60 subpart Ka	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(5), a Group 1 storage vessel that is also subject to the provisions of 40 CFR Part 60 subpart Ka is required to only comply with the provisions of 40 CFR Part 63 subpart CC. M,R,Rp - None required based on ND above. CAM is not applicable. The requirements esxtablished pursuant to OAC 3745-31-05(A)(3) are less stringent than 40 CFR Part 63 subpart CC.
T113 - T116	T113: 21.21 tons/yr VOC T114: 26.22 tons/yr VOC T115: 38.93 tons/yr VOC T116: 36.54 tons/yr VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records of the storage vessel's group designation for each stored material, an identification of each stored material, the average annual weight percent of HAP of each stored material, the maximum true vapor pressure and average annual true vapor pressure of each stored material, in psia, and the storage vessel's dimensions, and an analysis showing the capacity of the vessel. CAM is not applicable. ET - None required. Testing is not required for an annual emission limit.

T136, T137, T138, T139, T175, T176	Requirements of 40 CFR Part 60 subpart Kb	31-05(A)(3)	40 CFR 60 subpart Kb and 40 CFR 63 subpart CC	Y	Y	Y	N	N	Y	N	Y	N	N	N	ND - As specified under 40 CFR 63.640(n)(1), a 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. OR - The permittee shall store only petroleum liquids with a maximum true vapor pressure less than 76.6 kPa (0.754 psia) in this emissions unit. M - The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature; and c. the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. CAM is not applicable. The permittee shall maintain records of the actual annual throughput of each liquid stored in this emissions unit. ET - None required. This rule does not establish an emission limitation. The requirements established pursuant to OAC rule 3745-31-05(A)(3) include compliance with 40 CFR Part 60 subpart Kb.
T164	Requirements of 40 CFR Part 63 subpart CC	N	40 CFR 63 subpart CC	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(1), a Group 1 or Group 2 storage vessel that is 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.

T164	This emissions unit shall be equipped with a closed vent system controlled by the West Acid Gas Flare (emissions unit P001) meeting the requirements of 40 CFR 60.18. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, Subpart VV, 40 CFR 60.485(b).	31-05(A)(3)	40 CFR 60 subpart Kb and 40 CFR 63 subpart CC	N	N	Y	N	N	Y	N	Y	N	Y	N	M - The permittee shall maintain records of all periods of operation during which the West Acid Gas Flare pilot flame is absent. The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature; and c. the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. The permittee shall maintain records of the actual annual throughput of materials stored in this emissions unit and calculate the annual emissions from this emissions units according to A.V.1.b. ET - Testing is required under Part II of the poermit for refinery flares every 2.5 years in accordance with OAC rule 3745-21-10(P). CAM is not applicable. As specified under 40 CFR 63.640(n)(1), a Group 1 or Group 2 storage vessel that is 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. The requirements of OAC rule 3745-31-05(A)(3) include compliance with 40 CFR Part 60 subpart Kb.
T164, T170, T174	State requirements for fixed roof tanks	21-09(L)	N	N	N	N	N	N	N	N	N	N	N	N	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

T166	Negligible VOC emissions	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature; and c. the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. The permittee shall maintain records of the actual annual throughput of materials stored in this emissions unit and calculate the annual emissions from this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16
T166, T167, T174	Requirements of 40 CFR Part 63 subpart CC	N	40 CFR 63.646	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(1), a Group 1 or Group 2 storage vessel that is 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, except as provided in 40 CFR 63.640(n)(8).

T166, T167, T174	Requirements of 40 CFR Part 60 subpart Kb	N	40 CFR 60 subpart Kb	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - a. The external floating roof shall be equipped with a closure that consists of two seals, one above the other. i. The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. ii. The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as otherwise allowed in A.III.7. This emissions unit is exempt from the secondary seal gap requirement during the gap measurements for the primary seal required by A.III.4. b. Each opening in a non-contact external floating roof shall provide a projection below the liquid surface. Each opening in the roof is to be equipped with a gasketed seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap), except when the device is in actual use. Automatic bleeder vents 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. Rim vents are to be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. M - The permittee shall determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel, and between the secondary seal and the wall of the storage vessel according to the following frequency. a. Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed within 60 days of the initial fill with volatile organic liquid (VOL) and at least once every 5 years thereafter. b. Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year. c. If any source ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of A.III.4.a and b. The permittee shall visually inspect the external

T166, T167	Requirements of 40 CFR Part 60 subpart QQQ	N	40 CFR 60 subpart QQQ	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Each tank drain shall be equipped with water seal controls. M - Monthly visual inspection for conditions that would reduce the effectiveness of the water seal controls. CAM is not applicable. ET - Not required. This rule does not have an applicable emission limit that can be tested.
T170	Requirements of 40 CFR Part 63 subpart CC	N	40 CFR 63.640(n)(6)	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(6), a Group 2 storage vessel that is is subject to the control requirements of 40 CFR part 60 subpart K, is required to comply only with the requirements of 40 CFR part 60 subpart K.
T170	Requirements of 40 CFR Part 60 subpart K	31-05(A)(3)	40 CFR 60 subpart K	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records of all periods of operation during which the West Acid Gas Flare pilot flame is absent. The permittee shall maintain records showing: a. the type of material stored within the storage vessel; and b. the true vapor pressure of the stored material at maximum storage temperature. CAM is not applicable.
T170	1.42 tons per year volatile organic compounds (VOC) 0.14 ton per year sulfur dioxide (SO2)	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records of all periods of operation during which the West Acid Gas Flare pilot flame is absent. The permittee shall maintain records showing: a. the type of material stored within the storage vessel; and b. the true vapor pressure of the stored material at maximum storage temperature. The permittee shall maintain records of the actual annual throughput of materials stored in this emissions unit and calculate the annual emissions from this emissions unit according to A.V.1.a and b. CAM is not applicable. ET - Not required by Engineering Guide 16.

T174	19 tons/yr VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature; and c. the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. The permittee shall maintain records of the actual annual throughput of materials stored in this emissions unit and calculate the annual emissions from this emissions unit. CAM is not applicable. ET - Not required per Engineering Guide 16.

T045, T046	The tank shall be equipped with an internal floating roof. Automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.	31-05(A)(3) & 21-09(L)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp - None are required to comply with these requirements. CAM is not applicable. ET - none. There is no applicable emission limitation. OAC rule 3745-31-05(A)(3) includes compliance with OAC rule 3745-21-09(L).
T045, T046, T113 - T116	Requirements of 40 CFR Part 60 subpart K	N	40 CFR 60 subpart K	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(5), a Group 1 storage vessel that is also subject to the provisions of 40 CFR Part 60, subpart K is required to only comply with the provisions of 40 CFR Part 63, subpart CC.

T175	No person shall place, store, or hold in a fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, unless such tank, is designed or equipped with vapor control equipment which is one of the following: an internal floating roof; or, alternative equivalent control for VOC emissions	21-09(L)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature. CAM is not applicable. ET - This requirement does not have an associated emission limit to test.
T177	Requirements of 40 CFR Part 60 subpart Ka	N	40 CFR 60 subpart Ka	Y	N	N	N	N	N	N	N	N	N	N	ND - As specified under 40 CFR 63.640(n)(5), a Group 1 storage vessel that is also subject to the provisions of 40 CFR Part 60, subpart K or Ka is required to only comply with the provisions of 40 CFR Part 63, subpart CC.

T177	9.04 tons/yr VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - The permittee shall maintain records showing: a. the type of material stored within the storage vessel; b. the true vapor pressure of the stored material at maximum storage temperature; and The permittee shall maintain records of the actual annual throughput of materials stored in this emissions unit and calculate the annual emissions from this emissions unit according to A.V.1.a.
T177	State IFR tank requirements	21-09(L) & 31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	The tank shall be equipped with an internal floating roof. Automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling. M,R,Rp - None required for the above state requirements. CAM is not applicable. ET - None required for the above state requirements The requirements established pursuant to OAC rule 3745-31-05(A)(3) include compliance with OAC rule 3745-21-09(L).

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.
4. 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.