OhioEPA
State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Lake County
Application No: 02-6381

CERTIFIED MAIL

January 15, 1992

LUBRIZOL CORPORATION
FRANK A. DEL GRECO
155 FREEDOM RD
PAINESVILLE, OH 44077

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC
LAKE COUNTY HEALTH DEPT

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State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 02-6381
APS Premise No. 0243150025
Permit Fee: $390.00

Name of Facility: LUBRIZOL CORPORATION

Person to Contact: FRANK A. DEL GRECO

Address: 155 FREEDOM RD
PAINESVILLE, OH 44077

Location of proposed source(s): 155 FREEDOM RD
PAINESVILLE TWP, OHIO

Description of proposed source(s):
2-30,000 GAL STORAGE TANKS #702 & #703 FOR 30% HCL ACID EQUI
PPED W/ WATER SCRUBBER THAT IS 90% EFFICIENT.

Date of Issuance: January 15, 1992

Effective Date: January 15, 1992

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months, if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for LUBRIZOL CORPORATION located in Lake County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification/ Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/ or Control & Usage Requirements
T175	1-30,000 Gallon Fixed Roof Storage Tank #702 for 30% HCl Acid	A Circulating Water Scrubber and Conservation Vent Valve and Appropriate Diking. Control Device Shall Be 90% Efficient	3745-31-05 .06LBS/HR	0.27 lb/hr HCl Gas, Vapors, Fumes and Mists or 0.18 lb/hr HCl Acid Gas Only .04LB/HR
T176	1-30,000 Gallon Fixed Roof Storage Tank #703 for 30% HCl Acid	A Circulating Water Scrubber and Conservation Vent Valve and Appropriate Diking. Control Device Shall Be 90% Efficient	3745-31-05 .06LB/HR	0.27 lb/hr HCl Gas, Vapors, Fumes and Mists or 0.18 lb/hr HCl Acid Gas Only .04LB/HR

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
TSP (in the form of HCl gas, vapor and mist)	0.06
HCl (acid gas only)	0.04

MAINTENANCE OF EQUIPMENT

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

CALCULATION

ADDITIONAL COMMENTS

THROUGHPUT: 378,000 gal/yr/tank
DENSITY: 9.5 LBS/gal
operating schedule: 8760 hrs/yr

ACTUAL:

TSP: (T175 + T176 EMISSIONS ARE IDENTICAL)

FOR 1 TANK

USING AP42 (4.3-5 and 4.3-8)

L_B = 127.2
L_W = 205.3

L_T = 332.5 LBS/YR BEFORE CONTROL
33.3 LBS/YR/TANK AFTER CONTROL of 90%
or .02 TPY/tank

ALLOWABLE: ASSUMING THAT MAXIMUM THROUGHPUT WILL BE AT MOST DOUBLE THAT PROVIDED IN THE PERMIT AND AGAIN USING AP42 (4.3-5 and 4.3-8):

L_B = 127.2
L_W = (.000024)(36.5)(.62)(30,000)(25.2)(1)(1) = .06
= 410.6

L_T = 537.8 LBS/yr before control or .27 LBS/HR

after control L_T = 53.78 LBS/yr/tank or .03 TPY/tank

Correction which required PPI modification

TOXIC AIR CONTAMINANTS

or .02 TPY HCl gas only

EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienist (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IF YES, ATTACHED MODELING RESULTS, IF NO, ATTACH NEW SOURCE CODING FORM

IDENTIFY AIR CONTAMINANTS: HCl acid (TSP) in the form of HCl acid gas, vapor + mist.

$$\frac{.02}{.03} = \frac{X}{.27} \quad X = .18 \text{ LBS/HR}$$

.06 = .04 LBS/HR