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Facility Name: **BP Chemical Inc/PCS Nitrogen**

Application Number: **03-9943**

Date: **September 1, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the

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plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

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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 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 filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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AIR EMISSION SUMMARY

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

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P902 (Modification) previously permitted as emission units	Urea Granulation Plant No. 1: Solution concentration, solids formation, and product screening. Modification involves voluntary restrictions on short-term emission limitations to limit potential to emit.	Use of process scrubbers; compliance with the Permit Allowable Mass Emissions; and the Additional Special Terms and Conditions of this permit.	3745-31-05	12.0 pounds PE/hour*; 52.56 tons PE/year* 0.51 pound VOC/hour; 2.23 tons VOC/year 18.2 pounds NH ₃ /hour; 79.72 tons NH ₃ /year
P046 and P047	restrictions on short-term emission limitations to limit potential to emit.			Process Fugitive Emissions: 5.26 tons PE/year* 1.01 tons VOC/year 1.31 tons NH ₃ /year 20 percent opacity as a three-minute average
P902 (Mod) Cont'd			3745-17-11 (A)	** 20 percent opacity as a six-minute

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				average (stack)
			3745-17-07 (A)	Implementation of Site LDAR Program***
			40 CFR Part 60, Subpart VV and 3745-21-09(DD)	(See Additional Special Terms and Conditions)
P903 (New)	Urea Granulation Plant No. 2: Solution concentration, solids formation, and product screening	Use of process scrubbers; compliance with the Permit Allowable Mass Emissions; and the Additional Special Terms and Conditions of this permit	40 CFR Part 52 3745-31-05 3745-31-10 through 3745-31-20	12.0 pounds PE/hour** 52.56 tons PE/year* 0.5 pound VOC/hour; 2.19 tons VOC/year 13.7 pounds NH ₃ /hour 60.01 tons NH ₃ /year Process fugitive emissions: 3.94 tons PE/year* 1.01 tons VOC/year 1.31 tons NH ₃ /year 20 percent opacity as a three-minute average
P903 (New) Cont'd				**
			3745-17-11 (A)	20 percent Opacity as a six-minute

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				average (stack)
			3745-17-07 (A)	Implementation of Site LDAR Program***
			40 CFR Part 60, Subpart VV and 3745-21-09 (DD)	(See Additional Special Terms and Conditions)
P904 (Modification) previously permitted as emissions unit P045	Granular Urea Warehouse System: Warehouse, bagging, and bulk loading. Modification involves properly permitting the emissions unit as a controlled fugitive dust source.	Use of baghouse, conveyor enclosures, unloading chutes; compliance with the Permit Allowable Mass Emissions; and the Additional Special Terms and Conditions of this Permit	3745-31-05	Baghouse Stack Emissions: 0.7 pound PE/hour* 3.07 tons PE/year* 0.3 pound NH ₃ /hour 1.31 tons NH ₃ /year Fugitive Emissions: 5.26 tons PE/year* 1.31 tons NH ₃ /year 20 percent opacity as a three-minute average
P904 (Mod) Cont'd			3745-17-11 (A)	**
			3745-17-07 (A)	20 percent opacity as a six-minute average (stack)

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- * All particulate emissions are assumed to be less than 10 microns in size (PM₁₀)
- ** Applicable requirements established by this OAC rule are less stringent than the limitations requested by the permittee in accordance with OAC rule 3745-31-02(A)(2) or requirements established by OAC rule 3745-31-05.
- *** The facility implemented LDAR program plan defines and complies with all the requirements of 40 CFR Part 60 - Subpart VV, and OAC rule 3745-21-09(DD).

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Emissions (PE)	122.65
Volatile Organic Compounds (VOC)	6.44
Ammonia (NH ₃)	144.97

NSPS REQUIREMENTS

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

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P902	Urea Granulation Plant No. 1: Solution concentration, solids formation, and product screening.	VV
P903	Urea Granulation Plant No. 2: Solution concentration, solids formation, and product screening	VV

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

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

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

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Ohio EPA, Northwest District Office**
347 North Dunbridge Road
Bowling Green, OH 43402

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be

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reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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

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AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

This Permit to Install (PTI) allows for the modification of the facility's current urea granulation plant and the installation of a new urea granulation plant.

The new urea granulation plant will have a maximum capacity of 800 tons per day to supplement the facility's current 700 tons per day urea granulation plant. The new granulation plant will emit PE, VOC, and NH₃ which will be controlled by 3 process scrubbers. The addition of the new urea plant will increase the throughput for the current warehouse used to store granular urea product. The increased warehouse throughput is addressed in this permit under emissions unit P904.

A. Applicable Emission Limitations and/or Control Requirements

1. The following limitations for emissions unit P902 involve combined emissions from two separate process stacks, the granulator evaporator stack and the granulator scrubber stack (company stack identification EP-651 and EP-652, respectively):

12.0 lbs PE/hr
52.56 tons PE/yr
0.51 lb VOC/hr
2.23 tons VOC/yr
18.2 lbs NH₃/hr
79.72 tons NH₃/yr

2. Granular Urea Warehouse System, emissions unit P904, shall employ the following controls for limiting fugitive

particulate emissions:

- a. the warehouse building emissions shall be vented to a baghouse;
 - b. all conveying operations not contained within the warehouse building shall be enclosed; and,
 - c. all bulk truck and railcar loading operations shall use rubber chutes.
3. The permittee shall include the appropriate process equipment and regulated components for emission units P902 and P903 in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall comply with the appropriate provisions (includes operational restrictions, monitoring and recordkeeping, reporting, and testing) of Ohio Administrative Code (OAC) Rule 3745-21-09(DD) Leaks from process units that produce organic chemicals, and 40 CFR 60 Subpart VV (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry).

B. Operational Restrictions

1. Urea granulation plants No. 1 and No. 2, emission units P902 and P903, respectively, shall each be controlled by the use of three process scrubbers (evaporator scrubber, granulator scrubber, & combination scrubber). A range of operating values for pressure drop, water flow rate, and scrubbing liquid density shall be established during emission testing required by Section E.2.

The permittee shall maintain, the pressure drops, water flow rates, and scrubbing liquid density operating range values within the established ranges at all times while the emission units are in operation.

2. The pressure drop across the baghouse controlling particulate emissions from the granular urea warehouse building (emission unit P904) shall be maintained within the range of -4 to -12 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the following parameters for each scrubber controlling emissions units P902 and P903:

- a. static pressure drop across the scrubber;
- b. scrubber water flow rate; and,
- c. scrubbing liquid density.

The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with good engineering practice.

2. The permittee shall collect and record the following information each day for each scrubber controlling emission units P902 and P903:
 - a. the pressure drop across the scrubber, in inches of water, on a once per shift basis;
 - b. the scrubber water flow rate, in gallons per minute, on a once per shift basis; and,
 - c. the scrubbing liquid density, in specific gravity units, on a once per shift basis; and,
 - d. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse for emissions unit P904 while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with good engineering practice. The permittee

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shall record the pressure drop across the baghouse on daily basis.

4. The permittee shall collect and maintain the following information each month:
 - a. the granular urea production, in tons, from urea granulation plant No. 1, emissions unit P902;
 - b. the granular urea production, in tons, from urea granulation plant No. 2, emissions unit P903; and,
 - c. the annual, year to date granular urea production at the facility (summation of terms C.4.a and C.4.b for each calendar month to date from January to December).
5. 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 unless otherwise specified in this permit and/or required by either state or federal applicable regulations. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Ohio EPA, Northwest District Office;
 - b. quarterly written reports of (i) any deviations from emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken,

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shall be promptly made to the Ohio EPA, Northwest District Office.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters;

- c. written reports, which identify any deviations from the monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA, Northwest District Office every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months.

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

- d. 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 are true, accurate, and complete.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. all periods of time during which the following scrubber parameters were not maintained at or above the required levels for emission units P902 and P903:
 - i. the static pressure drop across the scrubber;
 - ii. the scrubber water flow rate; and,
 - iii. the scrubbing liquid density.
 - b. all periods of time during which the pressure drop across the baghouse for emissions unit P904 did not comply with the allowable range specified in section B.2.

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Each report shall be submitted within 30 days after the deviation occurs.

3. The compliance status of the emissions units P902, P903, and P904 shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
4. The actual annual emissions data for emissions units P902, P903, and P904 shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. Testing Requirements

1. Compliance Methods Requirements:

Compliance with the emission limitations listed in the Air Emission Summary of this PTI shall be determined in accordance with the following method:

a. Emission Limitation (short-term) for emissions unit P902

i. Stack emissions
(from evaporator and granulator stacks combined)

- aa. 12 lbs PE/hr;
- ab. 0.51 lb VOC/hr; and,
- ac. 18.2 lbs NH₃/hr.

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.2.e.

- ad. 20 percent opacity as a six-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

ii. Fugitive emissions

20 percent Opacity as a three-minute average

Applicable Compliance Method:

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Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

b. Emission Limitation (long-term) for emissions unit P902

i. Stack emissions:

52.56 tons PE/yr
2.23 tons VOC/yr
79.72 tons NH₃/yr

Applicable Compliance Method:

The tons/yr limitations were developed by multiplying the lb/hr limitations by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

ii. Fugitive emissions:

aa. 5.26 tons PE/yr

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Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 1.2 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitations are based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with these limits.

ab. 1.01 tons VOC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.23 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitations are based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with these limits.

ac. 1.31 tons NH₃/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.3 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitations are based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with these limits.

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c. Emission Limitation (short-term) for emissions unit P903

i. Stack emissions:

- aa. 12.0 lbs PE/hr;
- ab. 0.5 lb VOC/hr; and,
- ac. 13.7 lbs NH₃/hr.

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.2.e.

- ad. 20 percent opacity as a six-minute average (from stack)

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

ii. Fugitive emissions:

20 percent Opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

d. Emission Limitation (long-term) for emissions unit P903

i. Stack emissions:

52.56 tons PE/yr
2.19 tons VOC/yr
60.01 tons NH₃/yr

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Applicable Compliance Method:

The tons/yr limitations were developed by multiplying the lb/hr limitations by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

ii. Fugitive emissions:

aa. 3.94 tons PE/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.9 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitation is based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with this limit.

ab. 1.01 tons VOC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.23 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitation is based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with this limit.

ac. 1.31 tons NH₃/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.3 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and

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dividing by 2000 lbs/ton. The annual emission limitation is based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with this limit.

e. Emission Limitation (short-term) for emissions unit P904

i. Stack emissions (baghouse)

- aa. 0.7 lb PE/hr; and,
- ab. 0.3 lb NH₃/hr.

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section E.2.f.

- ac. 20 percent opacity as a six-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

ii. Fugitive emissions

20 percent opacity as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR 60, Appendix A - Method 9.

f. Emission Limitations (long-term) for emissions unit P904

i. Stack emissions (baghouse)

- 3.07 tons PE/yr
- 1.31 tons NH₃/yr

Applicable Compliance Method:

The tons/yr limitations were developed by multiplying the lb/hr limitations by the

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maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

ii. Fugitive emissions

aa. 5.26 tons PE/yr

Applicable Compliance Method:

Compliance shall be determined by use of the following equation and recordkeeping required in Section C.11.c:

$$\text{Tons PE/yr} = (\text{EF}) \times (\text{AP}) \times (1 - \text{CE}) \times 4.38$$

EF = 0.19 lb PE/ton, AP-42 emission factor

AP = Annual production of granular urea in tons/yr

CE = Assumed control efficiency of 90 percent

ab. 1.31 tons NH₃/yr

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Applicable Compliance Method:

The tons/yr limitation was developed by multiplying a 0.3 lb/hr emission factor based on engineering estimates by a maximum operation schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. The annual emission limitation is based on the emission unit's potential to emit. Therefore, no annual recordkeeping or deviation reporting is required to demonstrate compliance with this limit.

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

2. Emission Testing Requirements

- a. the permittee shall conduct, or have conducted, emission testing for emission units P902 and P903 in accordance with the following requirements:
 - i. the emission testing shall be conducted within 3 months after the start-up of the emissions unit;
 - ii. the emission testing shall be conducted to demonstrate compliance with the mass emission rate for the following pollutants:
 - aa. PE;
 - ab. VOC; and,
 - ac. NH₃.
 - iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - aa. PE: Method 5, 40 CFR Part 60, Appendix; A
 - ab. VOC: Method 25 or 25A, 40 CFR Part 60, Appendix A;

ac. NH₃: Modified Method 5, 40 CFR Part 60, Appendix A

aaa. the Method 5 impinger solutions of deionized, distilled water will be replaced by 0.1N sulfuric acid solution for ammonia collection. The impinger contents will be analyzed for ammonia using the NIOSH Method 6701 and the sampling train particulate filter will be analyzed for total ammonia. In addition, a 10 minute dry purge will be conducted after each test run to minimize potential off-gassing of free ammonia from the particulate filter and sample.

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

b. the permittee shall conduct, or have conducted, emission testing for emissions units P904 in accordance with the following requirements:

i. the emission testing shall be conducted within 3 months after the start-up of this emissions unit;

ii. the emission testing shall be conducted to demonstrate compliance with the mass emission rate for the following pollutants:

aa. PE; and,

ab. NH₃

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iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

aa. PE: Method 5, 40 CFR Part 60, Appendix A

ab. NH₃: Modified Method 5, 40 CFR Part 60, Appendix A

aaa. The Method 5 impinger solutions of deionized, distilled water will be replaced by 0.1N sulfuric acid solution for ammonia collection. The impinger contents will be analyzed for ammonia using the NIOSH Method 6701 and the sampling train particulate filter will be analyzed for total ammonia. In addition, a 10 minute dry purge will be conducted after each test run to minimize potential off-gassing of free ammonia from the particulate filter and sample.

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

c. the emission testing requirements contained in Section E.2 shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office; and,

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

Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and

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information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

F. Miscellaneous Requirements

None.