



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 22, 2012

REPLY TO THE ATTENTION OF:

LR-8J

7001 0320 0005.8933 1242

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

Ms. Suzanne Skrab
Environmental Assurance Engineer
The Lubrizol Corporation
29400 Lakeland Blvd.
Wickliffe, Ohio 44092

Re: Draft Federal RCRA Permit, The Lubrizol Corporation
Wickliffe, Ohio, OHD 004 172 565

Dear Ms. Skrab:

Enclosed is the draft Federal Resource Conservation and Recovery Act (RCRA) permit for The Lubrizol Corporation, Wickliffe, Ohio.

The draft Federal RCRA permit will be publicly noticed in "Lake County News Herald" and "Sun News" newspapers and "WBKC" radio station. A copy of the draft Federal RCRA permit is available for review at the Wickliffe Public Library, 1713 Lincoln Road, Wickliffe, Ohio 44092. The public comment period extends from March 22 to May 30, 2012. A public meeting will be held on May 15, 2012, 6:00 p.m. at Wickliffe Middle School, 29240 Euclid Ave., Wickliffe, Ohio 44092.

During the public comment period, you or any interested party may submit comments to the United States Environmental Protection Agency on the draft Federal RCRA permit set forth above. At the close of the comment period, the EPA will prepare a response to all significant comments. Comments on the draft Federal RCRA permit may be submitted to:

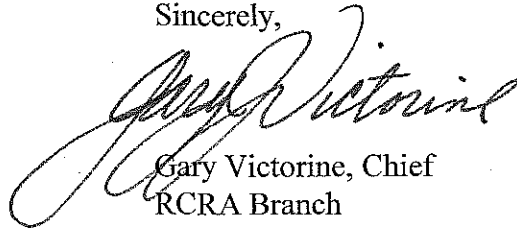
U.S. Environmental Protection Agency, Region 5
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Jae B. Lee

Following review of any comments received on the draft Federal RCRA permit, Region 5 will issue a final permit decision in accordance with the requirements of 40 Code of Federal Regulation (CFR) § 124.19.

If you have questions concerning the draft Federal RCRA permit, please contact Jae B. Lee of my staff at (312) 886-3781.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Victorine". The signature is written in black ink and is positioned above the printed name and title.

Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Jeremy Carroll, OEPA

DRAFT

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe, Ohio 44092

Owner: The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe, Ohio 44092

Operator: The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe, Ohio 44092

EPA Identification Number: OHD 004 172 565

Effective Date: 30 Days After Issuance Date of the Final Permit

Expiration Date: 10 Years from the Effective Date

Authorized Activities:

The U. S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to The Lubrizol Corporation (addressed in the second person as "you") in connection with the hazardous waste management operations at The Lubrizol Corporation, located in Wickliffe, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 USC § 6901 *et seq.*) (collectively referred to as "RCRA") and EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 CFR)).

Specifically, this permit addresses air emission standards for equipment leaks, tanks, and containers.

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271 (hereinafter called the "State RCRA permit").

The State RCRA permit was issued on March 6, 2002. (The effective and expiration dates of the State RCRA permit are March 6, 2002 and March 6, 2012, respectively.) Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited

Permit Approval:

On June 28, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio also received final authorization to administer certain additional RCRA requirements on several occasions since then.

However, because the EPA has not yet authorized the State of Ohio to administer certain RCRA regulations promulgated under HSWA, including the air emission standards for equipment leaks (40 CFR Part 264 Subpart BB) and the air emission standards for tanks and containers (40 CFR Part 264 Subpart CC), the EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 CFR Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted in your RCRA Part B Permit Application in August 2011, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application"), is accurate, and the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for the EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 CFR §§ 270.41, 270.42 and 270.43; and for enforcement action. You must inform the EPA of any deviation from, or changes in, the information in the Part B Permit Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after the EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review

only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR § 124.19.

Effective Date:

This permit is effective as of **30 Days After Issuance Date of the Final Permit** and will remain in effect until **10 Years from the Effective Date**, unless revoked and reissued under 40 CFR § 270.41, terminated under 40 CFR § 270.43, or continued in accordance with 40 CFR § 270.51(a).

By: _____ Date: _____
Margaret M. Guerriero
Director
Land and Chemicals Division

**OHD 004 172 565
The Lubrizol Corporation**

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

You are hereby allowed to manage hazardous waste at The Lubrizol Corporation (“facility”) in accordance with this permit. Under this permit, the operation of units storing RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage of RCRA hazardous wastes in containers are subject to the conditions in the State RCRA permit.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA.

This permit does not: (1) convey any property rights or any exclusive privilege; (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC §§ 9601 *et seq.* (commonly known as CERCLA); or (3) any other law protecting public health or the environment from any imminent and substantial endangerment to human health, welfare, or the environment.
(40 CFR §§ 270.4 and 270.30(g))

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

The EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 CFR §§ 270.41, 270.42, and 270.43. The EPA may also review and modify this permit, consistent with 40 CFR § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 CFR § 270.30(f))

You may request a modification of this permit under the procedures specified in 40 CFR § 270.42. A class 1 modification is generally allowed without prior approval by EPA except under certain conditions as described in 40 CFR § 270.42(a)(2). A class 2 modification requires prior approval by EPA as described in 40 CFR § 270.42(b). However, you may perform construction associated with a Class 2 permit modification

request beginning 60 days after submission of the request unless the Director establishes a later date under 40 CFR § 270.42(b)(8). Procedures for a class 3 modification are specified in 40 CFR § 270.42(c). You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective. (40 CFR §§ 270.42(b)(8) and 270.42(c))

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 CFR § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, the EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 CFR § 270.30(b) and RCRA Section 3005(c)(3))

I.C SEVERABILITY

This permit's provisions are severable; if any permit provision, or the application of any permit provision to any circumstance, is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 CFR § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 CFR Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E DUTIES AND REQUIREMENTS

I.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 CFR § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue an activity this permit regulates after its expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 days before the permit expires, unless the Director grants permission for a later date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 CFR §§ 270.10(h) and 270.30(b))

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective for 10 years from this permit's effective date. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 CFR § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 CFR §§ 270.50 and 270.51)

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 CFR § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 CFR § 270.30(d))

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 CFR § 270.30(e))

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act of 1995, 44 USC §§ 3501 *et seq.* (40 CFR §§ 264.74(a) and 270.30(h))

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to:

I.E.8.a Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I.E.8.b Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.E.8.d Sample or monitor any substances at any location at reasonable times, to assure permit compliance or as RCRA otherwise authorizes.

Notwithstanding any provision of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws. (40 CFR § 270.30(i))

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The methods used to obtain a representative sample of the feed streams, treatment residues, or other hazardous wastes to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261, or the methods specified in the Waste Characteristics which is Section C of the Part B Permit Application, or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA

600/4-79-020), or an equivalent method, as specified in the referenced Waste Characteristics. (40 CFR § 270.30(j)(1))

I.E.9.b You must retain, at the facility, records of all monitoring information as specified in 40 CFR § 264.74.

I.E.9.c You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. These periods may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 CFR §§ 270.30(j) and 270.31)

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 CFR § 270.30(l)(1))

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 CFR § 270.30(l)(2))

I.E.12 Certification of Construction

You must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer. That letter must state that the portions of the facility covered by this permit have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either: (40 CFR § 270.30(l)(2))

I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b The Director waives the inspection, if the inspection is not conducted within 30 days from the receipt of the certification.

I.E.13 Transfer of Permits

This permit is not transferable to any person, except after notice to the Director. Under 40 CFR § 270.40, the Director may require permit modification, or revocation and reissuance to change your name and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 266, 268, and 270, and must provide a copy of the RCRA permit to the new owner or operator. (40 CFR §§ 264.12(c), 270.30(l)(3), and 270.40(a))

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance with this permit that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the circumstances.

I.E.14.b The report must include the following (40 CFR §§ 270.30(l)(6) and 270.33): (1) Information concerning release of any hazardous waste that may endanger public drinking water supplies; (2) Information of a release or discharge of hazardous waste; or (3) Information of a fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. You must include the following information:

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the facility owner or operator;
- (3) Facility name, address and telephone number;
- (4) Date, time and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;
- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;

- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.14.c In addition to the oral notification required under Sections I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after you become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;
- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, you will then be required to submit a written report within 15 calendar days of the day on which you must provide oral notice, in accordance with Sections I.E.14.a and I.E.14.b of this permit. (40 CFR §§ 270.30(1)(6) and 270.30(h))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Section I.E.14 of this permit. (40 CFR § 270.30(l)(10))

I.E.16 Other Information

I.E.16.a Whenever you become aware that you failed to submit or otherwise omitted any relevant facts in the Part B Permit Application or other submittal, or submitted incorrect information in the Part B Permit Application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 CFR §§ 270.30(l)(11) and 270.30(h))

I.E.16.b All other requirements contained in 40 CFR § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 CFR § 270.11. (40 CFR § 270.30(k))

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the Environmental Protection Agency Region 5, RCRA Branch, at the following address:

RCRA Branch, LR-8J
Land and Chemicals Division
EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 CFR Part 2, Subpart B, you may claim any information this permit requires, or otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. (40 CFR § 270.12)

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by a qualified professional engineer, the following documents and all amendments, revisions, and modifications to them.

I.I.1 Operating Record

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 CFR §§ 264.13 and 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators that are required by 40 CFR § 268.7 to accompany an incoming shipment of hazardous wastes subject to 40 CFR Part 268, Subpart C, that specify treatment standards, as required by 40 CFR §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit on site, and you must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to enforcement

action under Section 3008 of RCRA. This may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 266, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Section I.B of this permit.

I.J.5 If any documents attached to this permit are found to conflict with any of the conditions in this permit, the condition will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with all applicable Clean Air Act (CAA) and RCRA permit limits. Where two or more operating limitations apply, the most stringent operating limitations take precedence.

SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS (40 CFR PART 264 SUBPART BB)

II.A EQUIPMENT LEAKS

II.A.1 Applicable Equipment

You must comply with all applicable requirements of 40 CFR § 264.1050 through 40 CFR § 264.1065, regarding air emission standards for equipment leaks. The applicable equipment contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight. The equipment for managing hazardous waste at this facility is considered as "in light liquid service" as defined in 40 CFR § 264.1031. Some pieces of equipment contact a hazardous waste stream that is considered as "In gas/vapor service" as defined in 40 CFR § 264.1031. The applicable equipment includes, but is not limited to, (1) pumps, (2) valves, (3) pressure relief devices, (4) flanges and other connectors, (5) sampling connection systems, and (6) open-ended valves or lines.

II.A.2 Pumps in Light Liquid Service (40 CFR § 264.1052)

II.A.2.a Each pump in light liquid service must be monitored monthly to detect leaks by the methods specified in 40 CFR § 264.1063(b), except: when each pump is (1) equipped with dual mechanical seal system satisfying the requirements of 40 CFR § 264.1052(d), (2) designated, as described in 40 CFR § 264.1064(g)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 parts per million (ppm) above background, and meeting the requirements of 40 CFR § 264.1052(e), or (3) equipped with a closed vent system complying with the requirements of 40 CFR § 264.1052(f).

II.A.2.b Each pump shall be checked by visual inspection each calendar week for seal leaks.

II.A.2.c A leak is detected if: (1) an instrument reading of 10,000 ppm or greater is measured, or (2) there is an indication of liquid dripping from the pump seal.

II.A.2.d When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR § 264.1059 - Standards: Delay of repair. The first attempt at repair must be made no later than 5 calendar days after each leak is detected.

II.A.3 Pressure Relief Devices in Gas/Vapor Services (40 CFR § 264.1054)

II.A.3.a Each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR § 264.1063(c), except during pressure releases.

II.A.3.b After each pressure release, the pressure release device shall be returned to a conditions of no detectable emissions, as soon as practicable, but no later than 5 calendar days after each pressure release except as provided in 40 CFR § 264.1059.

II.A.3.c No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions.

II.A.4 Sampling Connection Systems (40 CFR § 264.1055)

Each sampling connection system, except *in-situ* sampling systems and sampling systems without purges, shall be equipped with a closed-purge, closed-loop, or closed-vent system which meets one of the following requirements:

II.A.4.a Return the purged process fluid directly to the process line;

II.A.4.b Collect and recycle the purged process fluid; or

II.A.4.c Be designed and operated to capture and transport all the purged process fluid to a waste management unit that complies with applicable sections of 40 CFR § 264.1084 through § 264.1086 or a control device that complies with 40 CFR § 264.1060, Standards for Closed-Vent Systems and Control Devices.

II.A.5 Open-ended Valves or Lines (40 CFR § 264.1056)

II.A.5.a Each open-ended valve or line must be equipped with a: (1) cap, (2) blind flange, (3) plug, or (4) second valve, which seals the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line.

II.A.5.b Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed.

II.A.5.c When a double block and bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall seal the open end at all other times.

II.A.6 Valves in Gas/Vapor Service or in Light Liquid Service (40 CFR § 264.1057)

II.A.6.a Each valve in gas/vapor or light liquid service shall be monitored monthly to detect leaks in accordance with 40 CFR § 264.1057(a) and (c), except as provided in 40 CFR § 264.1057(f), (g), and (h).

II.A.6.b If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

II.A.6.c When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected in accordance with 40 CFR § 264.1057(d) and (e).

II.A.7 Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058)

II.A.7.a Pressure relief devices in light liquid service and flanges and other connectors must be monitored within 5 days by the method specified in 40 CFR § 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

II.A.7.b When a leak is detected, you must repair the leak as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR § 264.1059. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

II.A.7.c First attempts at repair include, but are limited to, the best practices described under 40 CFR § 264.1057(e).

II.A.8 Delay of Repair (40 CFR § 264.1059)

II.A.8.a Delay of repair of equipment for which leaks have been detected will be allowed if: (1) the repair is technically infeasible without a hazardous waste management unit shutdown; or (2) the equipment is isolated from the hazardous waste management unit and does not continue to contain or contact hazardous waste with organic concentrations at least 10 % by weight.

II.A.8.b Delay of repair for valves will be allowed if: (1) emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair; and (2) when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR § 264.1060.

II.A.8.c Delay of repair for pumps will be allowed if: (1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and (2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

II.A.8.d Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve only if it meets the provisions of 40 CFR § 264.1059(e).

II.A.9 Closed-Vent Systems and Control Devices (40 CFR § 264.1060)

Closed-vent systems and control devices shall comply with the provisions of 40 CFR §§ 264.1033 and 264.1060.

II.A.10 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak (40 CFR § 264.1061)

You may elect to have all valves within a hazardous waste management unit comply with an alternative standard that allows no greater than 2 % of the valves to leak if the provisions of 40 CFR §§ 264.1061(b) and (c) are met. You must notify the Director in writing, if you decide to discontinue the election of the alternative standards, that the work practice standards described in 40 CFR §§ 264.1057(a) through (e) will be followed; and comply with them.

II.A.11 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Skip Period Leak Detection and Repair (40 CFR § 264.1062)

You may elect for all valves subject to the requirements of 40 CFR § 264.1057 and Section II.A.7 within a hazardous waste management unit to comply with one of the alternative work practices specified below. You must notify the Director before implementing one of the alternative work practices.

II.A.11.a After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 %, you may begin to skip one of the quarterly leak detection periods for the valves.

II.A.11.b After 5 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 %, you may begin to skip 3 of the quarterly leak detection periods for the valves.

You must monitor valve leaks monthly in accordance with 40 CFR § 264.1057, if the percentage of valves leaking is greater than 2 %, but you may again elect to use the alternative standards after meeting the requirements of 40 CFR § 264.1057(c)(1).

II.B TEST METHODS AND PROCEDURES (40 CFR § 264.1063)

You must comply with the test methods and procedures of 40 CFR § 264.1063.

**II.C RECORDKEEPING AND REPORTING REQUIREMENTS
(40 CFR §§ 264.1064 and 264.1065)**

You must comply with the recordkeeping and reporting requirements of 40 CFR § 264.1064 and 264.1065.

**SECTION III – AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS
(40 CFR PART 264 SUBPART CC)**

You are permitted by the State portion of the permit to store hazardous wastes in three tanks (S-1, S-2, and S-4), which are located south of railroad tracks. The total capacity of the three tanks is 62,000 gallons (S-1: 25,000 gallons, S-2: 25,000 gallons, and S-4: 12,000 gallons). Hazardous waste is also stored in containers in the permitted containers storage area located in Building #64. The maximum capacity of this container storage area is 8,250 gallons.

You must comply with all applicable requirements of 40 CFR § 264.1080 through 40 CFR § 264.1090, regarding air emission standards for containers and tanks handling hazardous waste. All containers and tanks not exempt from 40 CFR Part 264 Subpart CC must be managed using the applicable standards at 40 CFR § 264.1084 and 40 CFR § 264.1086. The tanks and containers permitted in the State permit, described above, are Level 1 tanks and containers and must comply with the standards at 40 CFR § 264.1084(c), Tank Level 1 standards, and 40 CFR § 264.1086(c), Container Level 1 standards, respectively. You must not conduct waste stabilization process, as defined in 40 CFR § 265.1081, in containers and tanks.

III.A CONTAINER LEVEL 1 STANDARDS

You must manage the containers in the Building #64 with Container Level 1 standards as described at 40 CFR § 264.1086(c). When storing hazardous waste in Level 1 containers you must comply with the following requirements:

III.A.1 A Level 1 container must:

- (a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 CFR § 264.1086(f),
- (b) be equipped with a cover and closure devices with an acceptable tightness and construction materials in accordance with 40 CFR § 264.1086(c)(1)(ii), or

- (c) be an open-top container with organic vapor suppressing barrier to prevent hazardous waste from being exposed to the atmosphere as specified in 40 CFR § 264.1086(c)(1)(iii).

Containers, which do not meet DOT regulation specified in 40 CFR § 264.1086(f), must be equipped with covers and enclosures suitable for the physical and chemical characteristics of hazardous waste in containers, maintaining container integrity throughout the life of the container, and the environments under which the containers are placed in the storage facility. Any chemical used for vapor suppression must not generate heat and/or fume and must be compatible with the hazardous waste in the container. Vapor suppression chemicals must maintain an acceptable and stable barrier between the barrier and the hazardous waste. The barrier shall not chemically react to the hazardous waste. (40 CFR § 264.1086(c)(2))

III.A.2 All covers and closure devices must be in closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purpose and operates as defined in 40 CFR § 264.1086(c)(3)(i) through (v).

III.A.3 You must inspect the containers and their covers and closure devices in accordance with 40 CFR § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 CFR § 264.1086(c)(4)(iii).

III.A.4 You shall not transfer hazardous waste in or out of the containers.

III.B TANK LEVEL 1 CONTROLS

Tanks, S-1, S-2, and S-4 must comply with the Level 1 tank standards of 40 CFR § 264.1084(c) and the following requirements:

III.B.1 The maximum vapor pressure, as determined by 40 CFR § 264.1083(c)(2), must be less than 27.6 kilo-Pascal (kPa) for tanks S-1 and S-2. The maximum vapor pressure, as determined by 40 CFR § 264.1083(c)(2), must be less than 76.6 kPa for tank S-4.

III.B.2 The hazardous waste in the tank cannot be heated to a temperature that is greater than the temperature at which the maximum organic vapor pressure is determined under Condition III.B.1 (27.6 kPa for tanks S-1 and S-2; and 76.6 kPa for tank S-4).

III.B.3 Each tank must be a fixed roof design complying with the following specifications:

- (a) The tank closure devices must be designed and constructed to form a continuous barrier over the entire surface area of the hazardous waste in the tank. Gaskets used for closure devices or piping systems shall be of suitable materials compatible with the hazardous wastes and shall be in accordance with good engineering practices.
- (b) Each opening in the fixed roof and any manifold system associated with the fixed roof shall be equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device.
- (c) The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life.

III.B.4 Whenever a hazardous waste is in the tank, all openings (e.g., manholes, instruments connections, pipe nozzles) must be securely closed to prevent releases of vapors into the atmosphere, except for routine inspections, and maintenance.
(40 CFR § 264.1084(c)(3))

III.B.5 You must inspect the tanks, at least once per year, or retest the tanks to ascertain that the air emissions from the tank systems comply with the design and with the requirements specified in 40 CFR § 264.1084(c)(4).

III.B.6 You must process a Class 1 permit modification and obtain an approval from the Director, if you plan to operate or to modify the tank systems for complying with Level 2 control.

III.C RECORDKEEPING AND REPORTING REQUIREMENTS

You must comply with all applicable recordkeeping and reporting requirements described in 40 CFR § 264.1089 and § 264.1090.

Administrative Record Index *(Draft RCRA PERMIT)*

The Lubrizol Corporation
Wickliffe, Ohio
OHD 004 172 565

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. Part B Permit Renewal Application	August 25, 2011	Lubrizol
2. Part A Application	August 25, 2011	Lubrizol
3. Financial Assurance update	October 11, 2011	Lubrizol
4. EJ Analysis	January 2012	U.S. EPA
5. Draft RCRA permit	March 2012	U.S. EPA

U.S. EPA: United States Environmental Protection Agency

OEPA: Ohio Environmental Protection Agency

RCRA: Resource Conservation Recovery Act

EJ: Environmental Justice

Subpart BB: Air Emission Standards for Equipment Leaks

Subpart CC: Air Emission Standards for Tanks and Containers

March 2012

Draft Hazardous Waste Permit Renewal

**Public Participation
Procedures and
Comment Period
Ohio Administrative Code
(OAC) Rule 3745-50-22
(B)(5)(a)&(b)**

A public meeting will be held on May 15, 2012 at 6:00 p.m. at Wickliffe Middle School, 29240 Euclid Ave., Wickliffe, Ohio 44092 to receive public comments. Oral comments will be received during the public meeting. All persons, including the applicant, may submit written comments relating to this draft action. Written comments may be submitted before the end of the comment period to the address in the box on the right.

The comment period begins on March 22, 2012, and ends on May 30, 2012. A copy of the permit application and the draft permit is available for review by the public at the following locations:

Ohio EPA, Northeast District Office
2110 E Aurora Road
Twinsburg, OH 44087
(330) 963-1200

Ohio EPA, Central Office
Div. Materials & Waste Mgmt.
Lazarus Government Center
50 West Town St., Suite 700
Columbus, Ohio 43215
(614) 644-2621

The State of Ohio is authorized by United States Environmental Protection Agency (U.S. EPA) to administer its hazardous waste management program in lieu of the federal hazardous waste management program, except for portions of the federal standards for organic air emissions (40 CFR Part 264, Subparts BB and CC)

Facility Name: The Lubrizol Corporation
U.S. EPA I.D.: OHD 004 172 565
Location: 29400 Lakeland Blvd.
Wickliffe, OH 44092
Facility Owner: The Lubrizol Corporation
29400 Lakeland Blvd.
Wickliffe, OH 44092
Facility Operator: The Lubrizol Corporation
29400 Lakeland Blvd.
Wickliffe, OH 44092
Activity: Storage in containers and tanks, Treatment in tanks, Corrective Action
Comment Period: March 22, 2012 – May 30, 2012
Submit Comments to:

Ohio EPA
Mr. John Nyers
Div. of Materials & Waste Mgmt.
P.O. Box 1049
Columbus, Ohio 43216-1049
john.nyers@epa.state.oh.us

U.S. EPA, Region 5
Mr. Jae Lee
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Lee.Jae@epa.gov

from hazardous waste storage units. As an authorized program,

Ohio has the responsibility for issuing the RCRA permit for hazardous waste treatment, storage, and disposal facilities. U.S. EPA has drafted a federal RCRA permit to address organic air emissions from hazardous waste storage units for which Ohio is not yet authorized.

The Ohio draft permit is available for review by the public online at: <http://www.epa.ohio.gov/dmwm>

The federal draft permit is available for review by the public online at:

<http://www.epa.gov/reg5rcra/wptdiv/permits/index.htm>

and at the:

Wickliffe Public Library
1713 Lincoln Road
Wickliffe, Ohio 44092
(440) 944-6010

Within sixty (60) days of the close of the public comment period, Ohio EPA will, without prior hearing, issue the permit (or deny the request) in accordance with Chapter 3734 of the Ohio Revised Code (ORC). If Ohio EPA approves the application, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

Description of Facility OAC Rule 3745-50-22 (B)(1)

The Lubrizol Corporation is engaged primarily in the research, development, and testing of lubricant additives, fuel additives, and other specialty chemicals. These activities result in the generation of a variety of hazardous wastes. Some of these wastes are sent off-site within 90 days of generation and are stored in generator accumulation areas. Some wastes are stored in tanks or in containers in the permitted container storage unit. Treatment of wastes by phase separation is permitted in two of the three hazardous waste tanks.

Description of Requested Permit Renewal OAC Rule 3745-50-22 (B)(2)

This permit allows The Lubrizol Corporation to store 8,250 gallons of hazardous waste in the permitted container storage area in Building #64. Wastes stored in containers include listed wastes (F codes, P codes, and U codes) and characteristic wastes (D codes).

Wastes stored and treated in tanks include listed wastes (F codes and U codes) and characteristic wastes (D codes). A total of 62,000 gallons of hazardous waste may be stored in 3 tanks. Tanks S-1, S-2 and S-4 are above-ground, steel tanks with containment. A maximum of 25,000 gallons of hazardous waste may be treated in Tank S-1. Treatment is phase separation which results in an aqueous phase and an organic phase

which are then shipped off-site separately. Tank S-2 is primarily a storage tank but is used as a phase separation treatment tank whenever Tank S-1 is removed from service.

Regulatory Basis to Support the Decision to Renew the Permit Application OAC Rule 3745-50-22 (B)(3)

The director has determined that The Lubrizol Corporation has submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit which was issued by the Ohio EPA on March 6, 2002. The director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under Chapter 3734.05 of the Ohio Revised Code. The director has found that the Part B permit application meets the director's performance standards and that the facility has a history of compliance with this chapter, rules adopted under it, the existing permit, and orders entered into, which demonstrates reliability, expertise, and competency to subsequently operate the facility under this chapter, the rules, and the permit.

Contact Person OAC Rule 3745-50-22 (B)(6)

For additional information, please contact Robert Almquist at (330) 963-1217 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (312) 886-3781.

LubrizolWick.DRAFTRenewal.Factsheet.2012Mar.doc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 22 2012

REPLY TO THE ATTENTION OF:

LR-8J

Mr. Jeremy Carroll
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-0149

Re: Draft Federal RCRA Permit, The Lubrizol Corporation
Wickliffe, Ohio, OHD 004 172 565

Dear Mr. Carroll:

Enclosed please find a copy of the draft Federal Resource Conservation and Recovery Act permit and cover letter to the above-referenced facility.

If you have any questions, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary S. Setnicar".

Mary S. Setnicar, Chief
RCRA/TSCA Programs Section
Land and Chemicals Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 22 2012

Reference Desk Librarian
Wickliffe Public Library
1713 Lincoln Road
Wickliffe, Ohio 44092

REPLY TO THE ATTENTION OF:

LR-8J

Re: Draft Federal RCRA Permit
The Lubrizol Corporation
Wickliffe, Ohio
OHD 004 172 565

Dear Madam or Sir:

The United States Environmental Protection Agency intends to issue a draft Hazardous Waste Management permit to The Lubrizol Corporation, Wickliffe, Ohio. In accordance with the public involvement procedures in Title 40 Code of Federal Regulations Part 124, the draft Federal RCRA permit will be publicly noticed in "Lake County News Herald" and "Sun News" newspapers and "WBKC" radio station. A copy of the draft Federal RCRA permit is available for review at the Wickliffe Public Library, 1713 Lincoln Road, Wickliffe, Ohio 44092. The public comment period extends from March 22 to May 30, 2012. A public meeting will be held on May 15, 2012, 6:00 p.m. at Wickliffe Middle School, 29240 Euclid Ave., Wickliffe, Ohio 44092.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days under "Reference Materials – The Lubrizol Corporation". The following items are enclosed.

- Draft Permit
- Fact Sheet
- Public Notice

Thank you for your assistance. If you have any questions, please call me at 312-886-3781.

Sincerely,

Jae B. Lee, Permit Writer
RCRA Branch
Land and Chemicals Division