



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/17/2013

Certified Mail

Mr. Nick Frosini
Buckeye Terminals LLC - Warren Terminal
459 Moon Clinton Road
Coraopolis, PA 15017

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0278060355
Permit Number: P0111295
Permit Type: Renewal
County: Trumbull

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Warren Tribune Chronicle. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE

5/17/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Buckeye Terminals LLC - Warren Terminal
1001 YOUNGSTOWN WARREN RD,
Niles, OH 44446
Trumbull County
FACILITY DESC.: Other Warehousing and Storage

PERMIT #: P0111295

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for the Buckeye Warren Terminal to maintain Synthetic Minor status and reduce the VRU emission rate for emissions unit J001 from 60 mg/l to 35 mg/l due to the inclusion of floating roof landing emissions and tank cleaning emissions, which were not included in the previous PTE analysis.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Corey Kurjian, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Buckeye Terminal - Warren is a bulk gasoline terminal located in Trumbull county. Operations at the facility include one loading rack and numerous storage tanks.

3. Facility Emissions and Attainment Status:

Buckeye Terminal - Warren is located in Trumbull county and is classified as a synthetic minor facility for Title V and is not considered a "major source" for MACT. Trumbull County is designated attainment for all criteria pollutants.

4. Source Emissions:

Buckeye Terminal - Warren has requested federally enforceable synthetic minor restrictions which will limit facilitywide VOC emissions to 77.5 tons per rolling, 12-month period and facility wide HAPs emissions to 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs.

5. Conclusion:

With the federally enforceable synthetic minor restrictions in place, the facility will not trigger the thresholds for Title V or MACT.

6. Please provide additional notes or comments as necessary:

This FEPTIO renewal application requests that the VRU emission rate for emissions unit J001 be reduced from 60 mg/l to 35 mg/l in order to maintain its' synthetic minor status. The change is needed due to the inclusion of floating roof landing emissions and tank cleaning emissions, which were not included in the previous PTE analysis in 2007. Buckeye Terminal also wishes to include T002 in the FEPTIO in an effort to include all permitted emissions units into one permit.

Emissions unit J001 is not subject to NSPS 40 CFR, Part 60, Subpart XX since its' construction was prior to December 17, 1980.

40 CFR Part 60, subpart Kb (K and Ka) does not apply to the tanks due to the installation dates of 1956. Moreover, when the tanks were modified with internal floating roofs to accommodate the storage of gasoline and diesel, potential emissions from uncontrolled diesel storage in a fixed roof tank and potential emissions for gasoline stored in a fixed roof tank with an internal floating roof are almost identical. Therefore, no additional emissions will occur, thus not meeting the definition of a modification per 40 CFR Part 60.



The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

The area source MACT/GACT rules that may be applicable include 40 CFR, Part 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities).

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	77.5
Individual HAPs	9.9
Combined HAPs	24.9



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Warren Terminal**

Facility ID:	0278060355
Permit Number:	P0111295
Permit Type:	Renewal
Issued:	5/17/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Warren Terminal

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	13
1. J001, Loading Rack	14
2. T002, Distillate Oil Storage Tank #2 (417,000 gallons).....	19
3. Emissions Unit Group - Gasoline Storage Tanks (1,680,000 gallons)	23
4. Emissions Unit Group - Gasoline Storage Tanks (630,000 gallons).....	26



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0278060355
Application Number(s): A0045606
Permit Number: P0111295
Permit Description: FEPTIO renewal permit for the Buckeye Warren Terminal to maintain Synthetic Minor status and reduce the VRU emission rate for emissions unit J001 from 60 mg/l to 35 mg/l due to the inclusion of floating roof landing emissions and tank cleaning emissions, which were not included in the previous PTE analysis.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/17/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Buckeye Terminals LLC - Warren Terminal
1001 YOUNGSTOWN WARREN RD
Niles, OH 44446

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0111295
Permit Description: FEPTIO renewal permit for the Buckeye Warren Terminal to maintain Synthetic Minor status and reduce the VRU emission rate for emissions unit J001 from 60 mg/l to 35 mg/l due to the inclusion of floating roof landing emissions and tank cleaning emissions, which were not included in the previous PTE analysis.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	J001
Company Equipment ID:	Loading Rack
Superseded Permit Number:	P0086162
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Distillate Oil Storage Tank #2 (418,000 gallons)
Superseded Permit Number:	P0109595
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Gasoline Storage Tank #6 (1,680,000 gallons)
Superseded Permit Number:	P0086162
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T006
Company Equipment ID:	Gasoline Storage Tank #7 (630,000 gallons)
Superseded Permit Number:	P0086162
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	Gasoline Storage Tank #8 (630,000 gallons)
Superseded Permit Number:	P0086162
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T009
Company Equipment ID:	Gasoline Storage Tank #5 (1,680,000 gallons)
Superseded Permit Number:	P0086162
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Warren Terminal
Permit Number: P0111295
Facility ID: 0278060355
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2., B.3., B.4., B.5., B.6, and B.7.
2. This permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the facility. The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:
 - a) The total combined annual emissions from all facility emissions units, including permit to install and operate, exempt, and "de minimis" emissions units, shall not exceed the following as rolling, 12- month summations:
 - (1) VOC emissions shall not exceed 77.5 tons;
 - (2) Combined HAPs emissions shall not exceed 24.9 tons; and
 - (3) Any individual HAP emissions shall not exceed 9.9 tons.
 - b) Maximum annual throughput limitations for gasoline and distillates at the loading rack (J001) as specified in Section C.1.c)(1) – c)(2).
 - c) The permittee shall load and/or store petroleum-based products only.
3. The permittee shall collect and record the following VOC information each month for emissions units J001, T002, T005-T007 and T009, combined, and "de minimis" and exempt emissions units:
 - a) The company identification of each petroleum liquid loaded or stored;
 - b) The calculated VOC emissions from all petroleum liquids loaded and/or stored in emissions units J001, T002, T005-T007 and T009, combined, in tons;
 - c) The calculated VOC emissions from all petroleum liquids loaded and/or stored in "de minimis" and exempt emissions units, in tons;
 - d) The total VOC emissions from all petroleum liquids loaded and/or stored for all emissions units facility-wide combined, in tons [summation of B.3.b) and B.3.c)]; and
 - e) After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.



4. The permittee shall collect and record the following HAP information each month for all emissions units at the facility combined:
 - a) The company identification of each petroleum liquid loaded and/or stored;
 - b) The total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in emissions units J001, T002, T005-T007 and T009, combined, in tons, based on the following:
 - (1) multiply the VOC emissions from Section B.3.b) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);
 - c) The total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in "de minimis" and exempt emissions units, in tons, based on the following:
 - (1) multiply the VOC emissions from Section B.3.c) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);
 - d) The total emission rate for each individual HAP from all petroleum liquids loaded and/or stored, in tons [summation of B.4.b) and B.4.c)];
 - e) The total emission rate for combined HAPs from all petroleum liquids stored and/or loaded, in tons [summation of B.4.d)]; and
 - f) After the first 12 calendar months following the issuance of this permit, the rolling, 12-month individual HAP emissions and combined HAPs emissions, in tons.
5. The permittee shall submit quarterly deviation reports that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) the rolling, 12-month VOC emission limitation of 77.5 tons;
 - (2) the rolling, 12-month individual HAP emissions limitation of 9.9 tons;
 - (3) the rolling, 12-month combined HAPs emissions limitation of 24.9 tons;
 - (4) the probable cause of each deviation (excursion);
 - (5) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (6) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Ohio EPA's Northeast District Office.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

6. Testing Requirements

a) Compliance with the emission limitations in B.2.a) above shall be determined in accordance with the following method(s):

(1) Emission Limitation:

VOC emissions shall not exceed 77.5 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based upon the records required pursuant to B.3. above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

- i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).
- iv. The VOC emissions from gasoline, transmix or distillate truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

(2) Emission Limitations:

Combined HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period from all facility emissions units.

Any individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period from all facility emissions units.



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be based upon the records required pursuant to B.4. above.

7. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>

The area source MACT/GACT rules that may be applicable include 40 CFR, Part 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities).



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Warren Terminal
Permit Number: P0111295
Facility ID: 0278060355
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Loading rack for petroleum-based products with vapor recovery system

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., f)(1)a., and f)(2).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	VOC emissions from the vapor control system shall not exceed 35 mg per liter of material loaded. See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-31-05(A)(3)	See b)(2)a.
c.	OAC rule 3745-21-09(Q)	See c)(3) through c)(8), d)(1), d)(2) and e)(1). The emission limits established under this rule are less stringent than the emission limits established for VOC pursuant to OAC rule 3745-31-05(D).



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of a vapor collection and control system, compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-09(Q) and compliance with the terms and conditions of this permit.

c) Operational Restrictions

- (1) The maximum annual throughput of gasoline shall not exceed 319,000,000 gallons for this emissions unit based upon a rolling, 12-month summation of the gasoline throughput.
- (2) The maximum annual throughput of distillates shall not exceed 300,000,000 gallons for this emissions unit based upon a rolling, 12-month summation of the distillates throughput.
- (3) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. The pressure in the vapor collection system is maintained between minus six and plus eighteen inches of water gauge pressure.
- (4) The loading rack shall be equipped with a vapor control system whereby:
 - a. All vapors collected by the vapor collection system are vented to the vapor control system; and
 - b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
- (5) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (7) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
- (8) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (2) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels, using the 40 CFR Part 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last 5 minutes of the adsorption cycle for each vessel shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month throughput restrictions on gasoline and/or distillates;
 - ii. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or combined HAPs;
 - iii. all exceedances of the VOC emissions limitation of 35 mg per liter of material loaded from the vapor control system; and
 - iv. all deviations from the vapor collection system when the pressure is not maintained between minus 6 and plus 18 inches of water gauge pressure.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),



unless an alternative schedule has been established and approved by Ohio EPA's Northeast District Office.

- (2) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (Ohio EPA's Northeast District Office) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions from the vapor control system shall not exceed 35 mg per liter of material loaded.

Applicable Compliance Method:

Compliance with the emission limitation above shall be demonstrated based on the results of emission testing conducted pursuant to the emissions testing required in f)(2) below.
 - (2) The permittee shall conduct, or have conducted emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the emission limitation of VOC emissions from the vapor control system shall not exceed 35 mg per liter of material loaded.



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): methods and procedures found in OAC rule 3745-21-10(E) and 40 CFR Part 60.503.

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

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Ohio EPA, Northeast District Office. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. 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, Northeast 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, Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and 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.
- g. 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, Northeast 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, Northeast District Office.

g) Miscellaneous Requirements

- (1) None.



2. T002, Distillate Oil Storage Tank #2 (417,000 gallons)

Operations, Property and/or Equipment Description:

Tank #2, Interface (gasoline and diesel) 417,000 gallon fixed roof storage tank, equipped with internal floating roof

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., f)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.9 ton per year. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b. below.
d.	OAC rule 3745-21-09(L)	See c)(1) and d)(1) below.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pounds per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain monthly records of the following information;
 - a. the total throughput of each stored liquids, in gallons; and
 - b. the rolling, 12-month summations of the individual throughputs of liquids stored, in gallons.
- (4) The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections Facility-Wide Terms and Conditions B.3., B.4., and B.6.a)(1).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or combined HAPs;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Ohio EPA's Northeast District Office.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim



vents, and all openings other than stub drains were not maintained as required in this permit.

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions shall not exceed 0.9 ton per year.

Applicable Compliance Method:

Compliance with the annual VOC emissions from the storage tanks shall be determined based on the record keeping requirements specified in the Facility-Wide Terms and Conditions B.6.a)(1). (latest version of USEPA's "Tanks Program.").

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group - Gasoline Storage Tanks (1,680,000 gallons)

EU ID	Operations, Property and/or Equipment Description
T005	Gasoline fixed roof storage tank (tank #6), equipped with internal floating roof (1,680,000 gallons)
T009	Gasoline fixed roof storage tank (tank #5), equipped with internal floating roof (1,680,000 gallons)

Operations, Property and/or Equipment Description:

Gasoline Storage Tanks (1,680,000 gallons)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-21-09(L)	See c)(1) and d)(1).

- (2) Additional Terms and Conditions
 - a. None.



c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pounds per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain monthly records of the following information;
 - a. the total throughput of each stored liquids, in gallons; and
 - b. the rolling, 12-month summations of the individual throughputs of liquids stored, in gallons.
- (4) The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections Facility-Wide Terms and Conditions B.3., B.4., and B.6.a)(1).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or combined HAPs;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Ohio EPA's Northeast District Office.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- f) Testing Requirements
- (1) See B.6.a).
- g) Miscellaneous Requirements
- (1) None.



4. Emissions Unit Group - Gasoline Storage Tanks (630,000 gallons)

EU ID	Operations, Property and/or Equipment Description
T006	Gasoline fixed roof storage tank (tank #7), equipped with internal floating roof (630,000 gallons)
T007	Gasoline fixed roof storage tank (tank #8), equipped with internal floating roof (630,000 gallons)

Operations, Property and/or Equipment Description:

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-21-09(L)	See c)(1) and d)(1).

- (2) Additional Terms and Conditions
 - a. None.



c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pounds per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain monthly records of the following information;
 - a. the total throughput of each stored liquids, in gallons; and
 - b. the rolling, 12-month summations of the individual throughputs of liquids stored, in gallons.
- (4) The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections Facility-Wide Terms and Conditions B.3., B.4., and B.6.a)(1).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:



Draft Permit-to-Install and Operate

Buckeye Terminals LLC - Warren Terminal

Permit Number: P0111295

Facility ID: 0278060355

Effective Date: To be entered upon final issuance

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or combined HAPs;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Ohio EPA's Northeast District Office.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- f) Testing Requirements
 - (1) See B.6.a).
 - g) Miscellaneous Requirements
 - (1) None.