



10/25/2013

Certified Mail

Ms. Oksana Howard  
Lordstown Oil Terminal  
1801 California St, Ste. 3500  
Denver, CO 80202

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0278082015  
Permit Number: P0115379  
Permit Type: Initial Installation  
County: Trumbull

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Lordstown Oil Terminal**

Facility ID:	0278082015
Permit Number:	P0115379
Permit Type:	Initial Installation
Issued:	10/25/2013
Effective:	10/25/2013
Expiration:	10/25/2023





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Lordstown Oil Terminal

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**Final Permit-to-Install and Operate**  
Lordstown Oil Terminal  
**Permit Number:** P0115379  
**Facility ID:** 0278082015  
**Effective Date:** 10/25/2013

## Authorization

Facility ID: 0278082015  
Application Number(s): A0048528  
Permit Number: P0115379  
Permit Description: Initial PTIO for crude oil/condensate loading activities at the Lordstown Oil Terminal.  
Permit Type: Initial Installation  
Permit Fee: \$3,000.00  
Issue Date: 10/25/2013  
Effective Date: 10/25/2013  
Expiration Date: 10/25/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Lordstown Oil Terminal  
5232 Tod Ave SW  
Warren, OH 44481

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

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0115379

Permit Description: Initial PTIO for crude oil/condensate loading activities at the Lordstown Oil Terminal.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	R1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	R2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	L1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J002</b>
Company Equipment ID:	L2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J003</b>
Company Equipment ID:	L3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J004</b>
Company Equipment ID:	L4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J005</b>
Company Equipment ID:	L5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J006</b>
Company Equipment ID:	L6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	GEN1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	GEN2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**

Lordstown Oil Terminal

**Permit Number:** P0115379

**Facility ID:** 0278082015

**Effective Date:** 10/25/2013

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	GEN3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	GEN4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	GEN5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	GEN6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	FUG
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Lordstown Oil Terminal  
**Permit Number:** P0115379  
**Facility ID:** 0278082015  
**Effective Date:** 10/25/2013

## **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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 submitting 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 emission 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.

**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.



**Final Permit-to-Install and Operate**  
Lordstown Oil Terminal  
**Permit Number:** P0115379  
**Facility ID:** 0278082015  
**Effective Date:** 10/25/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Lordstown Oil Terminal

**Permit Number:** P0115379

**Facility ID:** 0278082015

**Effective Date:** 10/25/2013

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.
2. The Ohio EPA has determined that this facility may be subject 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 following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install and Operate**  
Lordstown Oil Terminal  
**Permit Number:** P0115379  
**Facility ID:** 0278082015  
**Effective Date:** 10/25/2013

## **C. Emissions Unit Terms and Conditions**



**1. F001, Unpaved Roadways**

**Operations, Property and/or Equipment Description:**

Unpaved Roadways

- 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. None.
- 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(A)(3)	No visible particulate emissions (PE) except for 3 minutes during any 60-minute period.  Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.  See b)(2)a. through b)(2)f.
b.	OAC rule 3745-17-07(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	See b)(2)a. through b)(2)f.



(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Any unpaved roadway or parking area that is subsequently paved, will require a permit for paved roadways and parking areas.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	daily



- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
  
- (3) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in Term d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to 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:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.



**Final Permit-to-Install and Operate**

Lordstown Oil Terminal

**Permit Number:** P0115379

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Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.



**2. F002, Paved Roadways**

**Operations, Property and/or Equipment Description:**

Paved Roadways

- 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. None.
- 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(A)(3)	No visible particulate emissions (PE) except for one minute during any 60-minute period.  Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.  See b)(2)a. through b)(2)f.
b.	OAC rule 3745-17-07(B)(4)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	See b)(2)a. through b)(2)f.



(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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all roads and parking areas	daily
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- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient



for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

(4) The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to 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:

No visible PE from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").



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g) Miscellaneous Requirements

(1) None.



**3. P801, Facility-Wide Fugitives**

**Operations, Property and/or Equipment Description:**

Facility-Wide Fugitives subject to LDAR requirements

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. None.

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(A)(3), as effective 11/30/01	See b)(2)a. and b)(2)c. through b)(2)g.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.

(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 3745-31-05 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 pollutants less than ten tons per year. However, that rule revision has not yet been approved by the 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 the 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 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, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

- c. For any transfer of crude oil from a tanker truck to the unloading rack, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line from the tanker truck to the unloading rack and a means to ensure that the vapor line is connected before crude oil is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the loading process back to the tanker truck.
- d. All crude oil loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.
- e. All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.
- f. The delivery vessel hatches shall be closed at all times during the unloading of the delivery vessel.
- g. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

c) Operational Restrictions

- (1) The vapor balance system shall be kept in good working order and shall be used at all times during the unloading of crude oil into the unloading rack.

d) Monitoring and/or Recordkeeping Requirements

(1) Leak Detection and Repair Program

- a. The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment and compressors covered by this permit. This leak detection and repair program shall include the following elements:

- i. An initial and then annual inspection of the ancillary and associated equipment and compressors shall be conducted to determine if a leak exists. Leaks shall be determined through the use of an analyzer meeting U.S. EPA Method 21, 40 CFR Part 60, Appendix A.



- ii. The analyzer shall be operated and maintained following the instrument manufacturer's operation and maintenance instructions.
- iii. A leak shall be determined if the instrument reading is equal to or greater than 10,000 ppm total VOC or the "leak detected" instrument reading required per any applicable rule.
- iv. Documentation that includes the following:
  - (a) The date the inspection was conducted;
  - (b) The name of the employee conducting the leak check;
  - (c) The identification of any component that was determined to be leaking; and
  - (d) The date the component was repaired and determined to no longer be leaking.
- b. The records associated with the leak detection and repair program 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 log of the downtime for the vapor balance system when this emissions unit is in operation.
- (3) While crude oil is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:
  - a. the date of inspection;
  - b. the leak detection method;
  - c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);
  - d. the corrective action(s) taken to repair each leak and the date of final repair;
  - e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and
  - f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to 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.
- (2) The permittee shall notify the Ohio EPA Northeast District Office in the annual Permit Evaluation Report (PER) each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.
- (3) The permittee shall notify the Ohio EPA Northeast District Office in the annual Permit Evaluation Report (PER) of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

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:

Control measures and work practices necessary to reduce and/or eliminate VOC leaks from process equipment.

Applicable Compliance Method:

If required, compliance with the control measures and work practices shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 21. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group – Railcar Loading Arms J001, J002, J003, J004, J005, and J006 for transferring crude oil/condensate from tanker trucks to railcars.

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
J001	Railcar Loading Arm 1
J002	Railcar Loading Arm 2
J003	Railcar Loading Arm 3
J004	Railcar Loading Arm 4
J005	Railcar Loading Arm 5
J006	Railcar Loading Arm 6

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. None.

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(A)(3), as effective 11/30/01	See b)(2)a. and b)(2)c. through b)(2)g.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.

(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 3745-31-05



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 pollutants less than ten tons per year. However, that rule revision has not yet been approved by the 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 the 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 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, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

- c. For any transfer of crude oil from a tanker truck to a railcar, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line for the unloading from the tanker truck and for the loading of the railcar and a means to ensure that the vapor line is connected before crude oil is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the transfer of crude oil/condensate from the railcar back to the tanker truck.
- d. All crude oil loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.
- e. All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.
- f. The delivery vessel hatches shall be closed at all times during the unloading of the delivery vessel.
- g. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

c) Operational Restrictions

- (1) The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of crude oil/condensate.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.
- (2) While crude oil is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:



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- a. the date of inspection;
- b. the leak detection method;
- c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);
- d. the corrective action(s) taken to repair each leak and the date of final repair;
- e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and
- f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

- (3) The permittee shall collect and maintain monthly records of the throughput of crude oil for each month, in gallons.
- (4) The permittee shall maintain records of percent individual and total combined HAP content of all crude oil loaded on a monthly basis.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA 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.
- (2) The permittee shall notify the Ohio EPA Northeast District Office in the annual Permit Evaluation Report (PER) each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.
- (3) The permittee shall notify the Ohio EPA Northeast District Office in the annual Permit Evaluation Report (PER) of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

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:  
Control measures and work practices necessary to reduce and/or eliminate VOC leaks from process equipment.



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Applicable Compliance Method:

If required, compliance with the control measures and work practices shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 21. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.



**5. Emissions Unit Group – Diesel Generator Engines P001, P002, P003, P004, P005, and P006**

**Operations, Property and/or Equipment Description:**

EU ID	Operations, Property and/or Equipment Description
P001	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 1
P002	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 2
P003	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 3
P004	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 4
P005	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 5
P006	73 HP Stationary Compression Ignition (CI) Internal Combustion Engine (ICE) 6

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. d)(5) – d)(8) and e)(2).

(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. None.

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(A)(3), as effective 11/30/01	Carbon monoxide (CO) emissions shall not exceed 1.85 g/kW-hr.  Nitrogen oxides (NOx) emissions shall not exceed 3.86 g/kW-hr.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart IIII  40 CFR 60.4204(b)	The exhaust emissions from these engines shall not exceed:



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 60.4201(a)  Table 3 to 40 CFR 1039.102	0.30 gram PM/kW-hr  4.7 grams NOx + NMHC/kW-hr  5.0 grams CO/kW-hr  See b)(2)c. and b)(2)d.
d.	40 CFR 60.4207(b)  40 CFR 80.510(b)	The sulfur content of the diesel fuel burned in these engines shall not exceed 15 ppm or 0.0015% sulfur by weight.  See b)(2)e., c(2), d(1), and e(2).
e.	40 CFR 1039.105  (certified by manufacturer)	Visible particulate emissions from the exhaust stack serving each engine shall not exceed the following:  20% opacity during the acceleration mode;  15% opacity during the lugging mode; and  50% opacity during the peaks in either the acceleration or lugging modes.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving each engine shall not exceed twenty (20) percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established for PE pursuant to 40 CFR Part 60, Subpart IIII.
h.	40 CFR 63 Subpart ZZZZ 40 CFR 63.6590(c)	A new area source operating in compliance with Part 60 Subpart IIII is the demonstration of compliance for 40 CFR 63 Subpart ZZZZ.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/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 BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the emissions of CO and NO<sub>x</sub> from each air contaminant source since the uncontrolled potential to emit for the emissions of CO and NO<sub>x</sub> is less than 10 tons per year.

- c. Each stationary compression ignition (CI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart IIII, the standards of performance for stationary CI ICE.
- d. Each stationary CI ICE has been or shall be purchased certified by the manufacturer, for its useful life\*, to emission standards as stringent as those identified in 40 CFR 60.4201(a) and found in 40 CFR 1039.102 Table 3, for engines greater than or equal to 50 horsepower (37 kilowatt) and less than 75 horsepower (56 kilowatt), and to the opacity standards found in 40 CFR 1039.105.

\*Useful life means the period during which the engine is designed to properly function in terms of reliability and fuel consumption, without being remanufactured, specified as a number of hours of operation or calendar years, whichever comes first. The values for useful life for stationary CI ICE with a displacement of less than 10 liters per cylinder are given in 40 CFR 1039.101(g). The values for useful life for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder are given in 40 CFR 94.9(a).

- e. The quality of the diesel fuel burned in each engine shall meet the following specifications on an "as received" basis:
  - i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur or 0.0015% sulfur by weight;
  - ii. a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent; and
  - iii. a heating value greater than 135,000 Btu/gallon.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.



c) Operational Restrictions

- (1) Each stationary CI ICE and any associated control device shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission-related settings that are allowed by the manufacturer. Each CI ICE must also be installed and operated to meet the applicable requirements from 40 CFR Part 89, Control of Emissions from New and In-use Non-road CI ICE; and Part 1068, the General Compliance Provisions for Engine Programs. The permittee shall operate and maintain each stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4204 over the entire life of the engine(s).
- (2) Diesel fuel burned in each CI, ICE shall not exceed the limit for sulfur as specified by 40 CFR 80.510(b), i.e., the maximum sulfur content of diesel fuel shall not exceed 15 ppm or 0.0015% sulfur by weight.
- (3) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in each engine, the permittee shall maintain records of the total quantity of the diesel oil received and the oil supplier's (or permittee's) analyses for sulfur content, in parts per million (40 CFR 80.510) or percent by weight. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR 80.580, using the appropriate ASTM methods. These records shall be retained for a minimum of 5 years and shall be available for inspection by the Director or his/her representative.
- (2) The permittee shall maintain the manufacturer's certification, that demonstrates compliance with the emission standards in Table 3 of 40 CFR 1039.102 and the opacity standards in 40 CFR 1039.105, on site or at a central location for all facility CI ICE; and the certification shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the certificate identification number. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.
- (3) The permittee shall maintain a record of the diesel fuel burned in each ICE during each calendar year. The fuel oil usage can be calculated at the end of each year using the best method available to estimate the annual throughput which might include, but shall not be limited to: any flow meter installed on the engine, records of the volume of diesel fuel oil received with each delivery, the fuel oil levels recorded from the diesel storage tank, and/or the recorded or estimated hours of operation along with the manufacturer's documentation of the fuel flow rate.



- (4) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall keep records of the date, time, and any corrective action(s) taken in response to the notification from the backpressure monitor, that the high backpressure limit of the engine has been approached or exceeded.
- (5) The permit to install application for emissions units, P001-P006, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 8 hours per day and 5 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic: N-Hexane

TLV (mg/m<sup>3</sup>): 176

Maximum Hourly Emission Rate (lbs/hr): 0.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 351.34

MAGLC (ug/m<sup>3</sup>): 4,190

Toxic: Toluene

TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 0.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 287.46

MAGLC (ug/m<sup>3</sup>): 1,786

The permittee, has demonstrated that emissions of N-Hexane and Toluene, from emissions units P001-P006, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
    - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
    - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
    - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
    - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
  - (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA 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.

- (2) The permittee shall submit annual reports to Ohio EPA's Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) The permittee shall identify in the annual permit evaluation report any period of time (date and number of hours) that the quality of oil burned in each engine did not meet the requirements established in 40 CFR 80.510(b), based upon the required fuel records; and the amount of non-compliant fuel burned on each such occasion.
- (4) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall include in the PER any records of the date, time, and any corrective action(s) taken in response to the notification from the monitor that the backpressure has been approached or exceeded.

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:

Carbon monoxide (CO) emissions shall not exceed 1.85 g/kW-hr.

Applicable Compliance Method:

The CO emissions factor of 1.85 g/kW-hr was supplied by the engine manufacturer.

If required, compliance with the hourly emissions limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 10 or 10B, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 3.86 g/kW-hr.



Applicable Compliance Method:

The NO<sub>x</sub> emissions factor of 3.86 g/kW-hr was supplied by the engine manufacturer.

If required, compliance with the hourly emissions limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

c. Opacity Limitations:

Visible particulate emissions from the exhaust stack serving each engine shall not exceed the following:

20% opacity during the acceleration mode

15% opacity during the lugging mode

50% opacity during the peaks in either the acceleration or lugging modes

Applicable Compliance Method:

The ICE shall be purchased certified to the opacity standards of 40 CFR 1039.105.

d. Opacity Limitation:

Visible particulate emissions from the exhaust stack serving each engine shall not exceed 20 %opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

e. Emission Limitations:

0.30 gram PM/kW-hr

Applicable Compliance Method:

The g/kW-hr limit is the emission limitation from Table 3 of 40 CFR 1039.102, the interim Tier 4 exhaust emission standards for 2008 to 2012 model year diesel engines between 50 and less than 75 horsepower (37 and <56 kW).

If required, the permittee shall demonstrate compliance with the PM emission limitation through performance tests conducted in accordance with the provisions in term f)(1)i below.



f. Emission Limitations:

4.7 grams NO<sub>x</sub> + NMHC/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining each engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 3 of 40 CFR 1039.102, the interim Tier 4 exhaust emission standards for 2008 to 2012 model year diesel engines between 50 and less than 75 horsepower (37 and <56 kW).

For the purpose of reporting emissions, where the limit is for NO<sub>x</sub> + NMHC, the NO<sub>x</sub> and VOC limits shall be calculated using a ratio of 76.0% NO<sub>x</sub> to 24.0% VOC.\*

4.7 g NO<sub>x</sub>+NMHC/kW-hr x 24.0% NMHC\* = 1.1 gram VOC/kW-hr

If required, the permittee shall demonstrate compliance with the NO<sub>x</sub>/NMHC emission limitation through performance tests conducted in accordance with the provisions in term f)(1)i below.

\*This ratio is based upon the linear relationship of NO<sub>x</sub> to NMHC from Table 1 of Subpart IIII, Table 1 from 40 CFR 89.112, to Tables 4, 5, and 6 from 1039.102.

g. Emission Limitations:

5.0 grams CO/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining each engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 3 of 40 CFR 1039.102, the interim Tier 4 exhaust emission standards for 2008 to 2012 model year diesel engines between 50 and less than 75 horsepower (37 and <56 kW).

If required, the permittee shall demonstrate compliance with the CO emission limitation through performance tests conducted in accordance with the provisions in term f)(1)i. below.

h. Sulfur Content Limitations for Diesel Fuel:

Sulfur content 15 ppm or ≤ 0.0015% sulfur by weight.



Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements for the sulfur content of each shipment of diesel oil received. If meeting the standards in 40 CFR 80.510(b), this calculates to approximately 0.0015lb SO<sub>2</sub>/MMBtu.

The heating value of the diesel fuel may be adjusted to that provided by the supplier.

- i. If it is determined by the Ohio EPA that a compliance demonstration is required through performance testing, it shall be conducted using one of the following test methods or procedures:
  - i. in accordance with 40 CFR 60.4212, conduct the exhaust emissions testing using the in-use testing procedures found in 40 CFR Part 1039, Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or
  - ii. in accordance with 40 CFR 60.4213, conduct exhaust emissions testing using the test methods identified in Table 7 to Subpart IIII of Part 60.

The exhaust emissions shall not exceed standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d).

g) Miscellaneous Requirements

- (1) None.