



11/26/2013

Certified Mail

Nick Frosini
Buckeye Terminals LLC - Columbus South Terminal
469 Moon Clinton Road
Coraopolis, PA 15108

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	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

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

Facility ID: 0125040239
Permit Number: P0115091
Permit Type: Renewal
County: Franklin

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, The Columbus Dispatch. 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO

PUBLIC NOTICE

11/26/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Buckeye Terminals LLC - Columbus South Terminal

303 WILSON ROAD,
COLUMBUS, OH 43204

Franklin County

FACILITY DESC.: Other Warehousing and Storage

PERMIT #: P0115091

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for bulk gasoline terminal loading rack and storage tanks.

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/permitsonline.aspx> by entering the permit # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Buckeye Terminals LLC – Columbus South Terminal (Buckeye Terminals) is an existing bulk petroleum distribution terminal located in Columbus, Ohio. The facility has a 7-bay loading rack (J001) controlled by a vapor recovery unit. The facility has eight permitted storage tanks. The facility's permit contains federally enforceable restrictions to avoid Title V and MACT requirements. The facility is limited to annual throughputs of 319,000,000 gallons of gasoline/ethanol and 300,000,000 gallons of distillate, based on rolling, 12-month summations.

The area source MACT, or GACT, Subpart BBBB applies to this facility, however, Ohio EPA has not accepted delegation authority for it at this time.

3. Facility Emissions and Attainment Status:

Buckeye Terminals is a synthetic minor source for VOC and HAP emissions. Franklin County is currently in nonattainment for the 2008 eight-hour ozone standard.

4. Source Emissions:

Buckeye Terminals is a source of VOC and HAP emissions from the loading and storage of petroleum products. Emissions from the loading rack (J001) are controlled by a vapor recovery unit.

Buckeye Terminals has updated their facility-wide potential to emit to include roof landing and tank cleaning emissions. As a result, Buckeye Terminals has requested to lower their federally enforceable VOC emissions limitation to 0.29 pound of VOC per 1,000 gallons (35 milligrams per liter) of gasoline loaded into the delivery vessel. Additionally, the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) for tanks T007, T008, T017 and T020 have been adjusted to include emissions from roof landings and tank cleaning.

According to Engineering Guide #8, periodic compliance tests are necessary to prove continued compliance and should occur at least once per permit term. The facility last performed a compliance test in January 2011. Two compliance tests will be required by this permit: one within six months after permit issuance and one within six months prior to the permit expiration.



Floating Roof Tanks with Gasoline	Tank VOC Emissions	Roof Landings VOC Emissions	Tank Cleanouts VOC Emissions	Total VOC Emissions	Combined HAPs Emissions
Tank No.	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
T005	1.63	0.07	0.00	1.71	0.13
T002	0.44	0.31	0.00	0.76	0.06
T004	0.37	0.14	0.00	0.51	0.04
T007	2.93	0.42	0.00	3.35	0.25
T008	1.45	0.19	0.00	1.63	0.12
T017	0.65	0.94	2.04	3.63	0.27
T018	1.97	0.21	0.00	2.17	0.16
T020	0.74	0.42	0.00	1.16	0.09
T003	0.34	0.08	1.51	1.94	0.15
T001	1.35	0.94	2.04	4.33	0.33
T019	0.60	0.54	0.00	1.14	0.09
Fixed Roof Tanks Distillates (Jet for PTE purposes)	Tank VOC Emissions	Roof Landings VOC Emissions	Tank Cleanouts VOC Emissions	Total VOC Emissions	Combined HAPs Emissions
Tank No.	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
T015	1.1			1.06	
T016	0.5			0.48	
T021	1.72			1.72	0.18
Fixed Roof/Horizontal Additive Tanks (Ethanol for PTE)	Tank VOC Emissions	Roof Landings VOC Emissions	Tank Cleanouts VOC Emissions	Total VOC Emissions	Combined HAPs Emissions
Tank No.	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
T013	0.10			0.10	0.01
G001	0.08			0.08	0.00
T011	0.10			0.10	0.01
T012	0.05			0.05	0.00
Restricted GAS Throughput 319 million gal/yr VRU limited to 35 mg/l	VOC Emissions				Combined HAPs Emissions
Truck Rack	(ton/yr)				(ton/yr)
Truck Rack	46.56				4
Distillate Loading 300 Million gal/yr VRU limited to 35 mg/l	VOC Emissions				Combined HAPs Emissions
Truck Rack	(ton/yr)				(ton/yr)
Truck Rack	0.35				0
Fugitive Equipment	VOC Emissions				Combined HAPs Emissions
	(ton/yr)				(ton/yr)
Pumps, Flanges, Valves	0.80				0.06
Truck Fugitives	17.29				1.31
Facility-wide Total VOC Emissions = 90.9 ton/yr					
Facility-wide Total Combined HAPs Emissions = 7.0 ton/yr					



5. Conclusion:

The issuance of P0115091 is recommended. The emission limitations, operational restrictions, monitoring, recordkeeping and testing requirements contained in this FEPTIO are adequate to ensure that the applicable VOC and HAP thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	90.9
Individual HAP	9.9
Combined HAP	24.9



DRAFT

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

Facility ID:	0125040239
Permit Number:	P0115091
Permit Type:	Renewal
Issued:	11/26/2013
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 - Columbus South Terminal

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Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0115091
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040239
Application Number(s): A0048230, A0048277, A0048278, A0048279
Permit Number: P0115091
Permit Description: FEPTIO renewal permit for bulk gasoline terminal loading rack and storage tanks.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/26/2013
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 - Columbus South Terminal
303 WILSON ROAD
COLUMBUS, OH 43204

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0115091
 Permit Description: FEPTIO renewal permit for bulk gasoline terminal loading rack and storage tanks.

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: | P0082688 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T007 |
| Company Equipment ID: | Tank #6 |
| Superseded Permit Number: | 01-08235 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T008 |
| Company Equipment ID: | Tank #7 |
| Superseded Permit Number: | 01-08235 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T017 |
| Company Equipment ID: | Tank #9 |
| Superseded Permit Number: | 01-7994 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T020 |
| Company Equipment ID: | Tank #11 |
| Superseded Permit Number: | 01-01322 |
| General Permit Category and Type: | Not Applicable |

Group Name: Pre-BAT Tanks

Emissions Unit ID:	T001
Company Equipment ID:	Tank #33
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Tank #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Tank #31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Tank #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0115091
Facility ID: 0125040239
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. 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 Ohio EPA DAPC, Central 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 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.



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0115091
Facility ID: 0125040239
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) 2., 3., 4., and 5.
2. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
3. The permittee shall on a monthly basis maintain the following information for the entire facility:
 - a) the individual HAP emissions, in tons per month;
 - b) the combined HAP emissions, in tons per month;
 - c) the rolling, 12-month summation of individual HAP emissions, in tons; and
 - d) the rolling, 12-month summation of combined HAP emissions, in tons.
4. 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:
 - (1) all exceedances of the rolling, 12-month individual HAP emission limitation; and
 - (2) all exceedances of the rolling, 12-month combined HAP emission limitation.
 - b) the permittee shall submit the quarterly deviation (excursion) reports in accordance with the Standard Terms and Conditions.
 - c) the probable cause of each deviation (excursion).
 - d) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).



e) 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 director (Ohio EPA, Central District Office).

5. Emission Limitations

The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.

Applicable Compliance Method

Compliance with these emission limitations shall be determined as follows:

a) For individual and combined HAP emissions from gasoline loading, multiply the VOC emissions by the following HAP emission factors derived from using the speciation option of the U.S. EPA's TANKS program:

- benzene – 0.0062539 pound of benzene emissions per pound of VOC emissions;
- ethylbenzene - 0.0006313 pound of ethylbenzene emissions per pound of VOC emissions;
- hexane - 0.0442761 pound of hexane emissions per pound of VOC emissions;
- toluene - 0.0084213 pound of toluene emissions per pound of VOC emissions;
- xylene - 0.0023501 pound of xylene emissions per pound of VOC emissions;
- 2,2,4-trimethylpentane - 0.0095315 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions;
- methyltert-butyl ether – 0.003 pound of methyl tert-butyl ether emissions per pound of VOC emissions; and
- styrene – 0.0008817 pound of styrene emissions per pound of VOC emissions.

b) For individual and combined HAP emissions from distillate loading, multiply the VOC emissions by the following HAP emission factors derived from using the speciation option of the U.S. EPA's TANKS program:

- benzene - 0.0214899 pound of benzene emissions per pound of VOC emissions;
- ethylbenzene - 0.0089161 pound of ethylbenzene emissions per pound of VOC emissions;
- hexane - 0.001 pound of hexane emissions per pound of VOC emissions;
- toluene - 0.06003 pound of toluene emissions per pound of VOC emissions;
- xylene - 0.0291038 pound of xylene emissions per pound of VOC emissions; and
- 2,2,4-trimethylpentane - 0.0032695 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions; and



cumene – 0.0019394 pound of cumene emissions per pound of VOC emissions.

- c) For individual and combined HAP emissions from the storage tanks, use the speciation option of the most recent version of the U.S. EPA's TANKS program.
6. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, 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 this rule are in effect and shall be enforced 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>.



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0115091
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

7-Bay Truck Loading Rack Controlled by a Vapor Recovery Unit

- 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)b., b)(2)a., b)(2)b., d)(11), e)(3) 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 3745-21-09(Q)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D). See c)(1) through c)(6) below.
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	Limitation applicable to the loading of gasoline (i.e. gasoline, ethanol and gasoline additives): 0.29 pound of VOC per 1,000 gallons (35 milligrams per liter (mg/L)) of gasoline loaded into the delivery vessel. The total VOC emissions from loading gasoline (i.e. gasoline, ethanol and gasoline additives) and distillates (i.e. diesel and diesel additives) shall not exceed 64.2 tons per rolling 12-month



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		period (including fugitive emissions). See b)(2)a. and b)(2)b. below. See 2. through 5. of Section B - Facility-Wide Terms and Conditions.

- (2) Additional Terms and Conditions
 - a. The annual throughput of gasoline (i.e. gasoline, ethanol and gasoline additives) shall not exceed 319,000,000 gallons per rolling, 12-month period.
 - b. The annual throughput of distillate (i.e. diesel and diesel additives) shall not exceed 300,000,000 gallons per rolling, 12-month period.
- c) Operational Restrictions
 - (1) 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 6 and plus 18 inches of water gauge pressure.
 - (2) 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.
 - (3) 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.
 - (4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (5) 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.
 - (6) 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 repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (3) The permittee shall maintain the carbon adsorption vapor recovery unit (VRU) in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (4) The permittee shall maintain the data required by the VRU manufacturer's recommended daily operating guidelines on a daily basis. The permittee shall submit a copy of the operating guidelines checklist to the Ohio EPA, Central District Office within 90 days of the issuance of this permit. Any subsequent revisions to this checklist shall be mutually agreeable to the permittee and the Ohio EPA, Central District Office.
- (5) The permittee shall maintain the lowest maximum required vacuum level and duration needed to assure regeneration of the carbon beds as determined by an engineering analysis or from the manufacturer's recommendation.
- (6) The permittee shall monitor and record the vacuum level using a pressure transmitter installed in the vacuum pump suction line, with the measurements displayed on a gauge that can be visually observed. Each carbon bed shall be observed during one complete regeneration cycle on each day of operation of the loading rack to determine the maximum vacuum level achieved.
- (7) The permittee shall conduct annual testing of the carbon activity for the carbon in each carbon bed. Carbon activity shall be tested in accordance with the butane working capacity test of the American Society for Testing and Materials (ASTM) Method D 5228-92 or by another suitable procedure as recommended by the manufacturer.
- (8) The permittee shall conduct and record monthly measurements of the carbon bed outlet volatile organic compounds (VOC) concentration over the last 5 minutes of an adsorption cycle for each carbon bed, documenting the highest measured VOC concentration. Measurements shall be made using a portable analyzer, or a permanently mounted analyzer, in accordance with 40 CFR part 60, Appendix A-7, EPA Method 21 for open-ended lines.



- (9) The permittee shall verify and record, during each day of operation of the loading rack, the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation.
- (10) The permittee shall perform semi-annual preventive maintenance inspections of the carbon adsorption system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.
- (11) The permittee shall maintain monthly records of the following information:
 - a. the total throughput of gasoline (i.e. gasoline, ethanol and gasoline additives), in gallons;
 - b. the total throughput of distillates (i.e. diesel and diesel additives), in gallons;
 - c. the VOC emissions from J001, in tons;
 - d. the rolling, 12-month summation of the total gasoline throughput, in gallons
 - e. the rolling, 12-month summation of the total distillate throughput, in gallons; and
 - f. the rolling, 12-month summation of VOC emissions from J001, in tons.

e) Reporting Requirements

- (1) 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.
- (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 (the Ohio EPA, Central 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 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 gasoline throughput limitation;
 - ii. all exceedances of the rolling, 12-month distillate throughput limitation; and
 - iii. all exceedances of the rolling, 12-month VOC emission limitation.



- 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 director (the Ohio EPA, Central District Office).

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.

f) Testing Requirements

- (1) 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 permit issuance and within 6 months prior to the permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC mass emission limitation of 35 mg per liter of gasoline loaded (0.29 pound of VOC per 1,000 gallons of gasoline loaded) in accordance with the procedures specified in OAC rule 3475-21-10(E).

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

- c. 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, Central 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, Central District Office's refusal to accept the results of the emission test(s).
- d. Personnel from the Ohio EPA, Central 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.

- e. 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, Central 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, Central District Office.
- (2) 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
0.29 pound of VOC per 1,000 gallons (35 milligrams per liter (mg/l)) of gasoline/distillates loaded

Applicable Compliance Method
Compliance with this emission limitation shall be demonstrated through the emission testing required in f)(1) above.
 - b. Emission Limitation
The total VOC emissions from loading gasoline and distillates shall not exceed 64.2 tons per rolling 12-month period (including fugitive emissions).

Applicable Compliance Method
Compliance with this emission limitation shall be determined based upon the recordkeeping in d)(11) above and a summation of the stack and fugitive emissions from gasoline and distillate loading as follows:
 - i. For stack emissions from gasoline loading, sum the monthly gasoline throughputs for the 12-month period and multiply this sum by the emissions factor established based upon the most recent emission test that demonstrated the emissions unit was in compliance (in lb VOC/1,000 gallons gasoline loaded) and divide by 2,000 lb/ton.
 - ii. For fugitive emissions from gasoline loading, sum the monthly gasoline throughputs for the 12-month period and divide this sum by 2,000 lb/ton and multiply by the emission factor 0.00010849 lb/gal (13 mg/L) obtained from Appendix A of U.S. EPA's Gasoline Distribution Industry (Stage I) – Background Information for Promulgated Standards (November 1994).
 - iii. For distillate fuel loading emissions, sum the distillate fuel throughputs for the 12-month period and divide this sum by 2,000 lb/ton and multiply by the emission factor (lb VOC/1,000 gallons gasoline) obtained using



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Equation 1 from AP-42, Section 5.2 multiplied by the overall reduction efficiency term of $(1 - \text{efficiency} / 100)$ (AP-42, Section 5.2 (June 2008), page 5.2-6) using an overall capture/control efficiency of 80%.

- g) Miscellaneous Requirements
 - (1) None.



2. Emissions Unit Group -Pre-BAT Tanks: T001, T002, T003, T004

EU ID	Operations, Property and/or Equipment Description
T001	2,241,287 Gallon Gasoline Storage Tank with Domed External Floating Roof
T002	667,187 Gallon Gasoline Storage Tank with Domed External Floating Roof
T003	2,175,142 Gallon Gasoline Storage Tank with Domed External Floating Roof
T004	216,200 Gallon Gasoline Storage Tank with Domed External 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)b.

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 3745-21-09(L)	See c)(1) below.
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 5. of Section B - Facility-Wide Terms and Conditions.

(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 pound 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.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall notify the director (the Ohio EPA, Central 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.

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. None.



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- g) Miscellaneous Requirements
 - (1) None.



3. T007, Tank #6

Operations, Property and/or Equipment Description:

623,055 Gallon Gasoline Storage Tank 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)c.
- 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 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.3 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Kb.</p>
c.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 5. of Section B - Facility-Wide Terms and Conditions.
d.	40 CFR Part 60, Subpart Kb	See c)(1) below.
e.	40 CFR Part 60, Subpart A	See b)(2)a. below.



- (2) Additional Terms and Conditions
 - a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19) as specified in 40 CFR Part 60, Subpart Kb.
- c) Operational Restrictions
 - (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b. The internal floating roof shall be equipped with a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.



- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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 pound 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 annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) **Reporting Requirements**

- (1) 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.
- (2) The permittee shall notify the director (the Ohio EPA, Central 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (4) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.



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:

Volatile organic compound (VOC) emissions shall not exceed 3.3 tons per year.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program.

(2) The permittee shall comply with the applicable testing and procedures requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

(1) None.



4. T008, Tank #7

Operations, Property and/or Equipment Description:

445,543 Gallon Gasoline Storage Tank with Domed External Floating Roof (treated as an Internal Floating Roof for emissions calculations per AP-42, Section 7.1.1.4)

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)c.

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 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.6 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Kb.</p>
c.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 5. of Section B - Facility-Wide Terms and Conditions.
d.	40 CFR Part 60, Subpart Kb	See c)(1) below.
e.	40 CFR Part 60, Subpart A	See b)(2)a. below.



- (2) Additional Terms and Conditions
 - a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19) as specified in 40 CFR Part 60, Subpart Kb.
- c) Operational Restrictions
 - (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b. The internal floating roof shall be equipped with a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.



- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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 pound 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 annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) **Reporting Requirements**

- (1) 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.
- (2) The permittee shall notify the director (the Ohio EPA, Central 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (4) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.



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:

Volatile organic compound (VOC) emissions shall not exceed 1.6 tons per year.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program. Per Section 7.1.1.4 of AP-42, this tank should be treated as an Internal Floating Roof when calculating emissions.

(2) The permittee shall comply with the applicable testing and procedures requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

(1) None.



5. T017, Tank #9

Operations, Property and/or Equipment Description:

2,311,856 Gallon Gasoline Storage Tank with Domed External 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)c.

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 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.6 tons per year.
c.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 5. of Section B - Facility-Wide Terms and Conditions.
d.	40 CFR Part 60, Subpart Kb	See c)(1) below.
e.	40 CFR Part 60, Subpart A	See b)(2)a. below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19) as specified in 40 CFR Part 60, Subpart Kb.



- b. None.
- c) Operational Restrictions
 - (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b. The internal floating roof shall be equipped with a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.



- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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 pound 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 annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall notify the director (the Ohio EPA, Central 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (4) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.

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:



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0115091
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 3.6 tons per year.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program.

- (2) The permittee shall comply with the applicable testing and procedures requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

- (1) None.



6. T020, Tank #11

Operations, Property and/or Equipment Description:

616,500 Gallon Gasoline Storage Tank 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)c.
- 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 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.2 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Kb.</p>
c.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 5. of Section B - Facility-Wide Terms and Conditions.
d.	40 CFR Part 60, Subpart Kb	See c)(1) below.
e.	40 CFR Part 60, Subpart A	See b)(2)a. below.



- (2) Additional Terms and Conditions
 - a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19) as specified in 40 CFR Part 60, Subpart K.
- c) Operational Restrictions
 - (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b. The internal floating roof shall be equipped with a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.



- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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 pound 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 annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) **Reporting Requirements**

- (1) 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.
- (2) The permittee shall notify the director (the Ohio EPA, Central 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (4) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.



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:

Volatile organic compound (VOC) emissions shall not exceed 1.2 tons per year.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program.

(2) The permittee shall comply with the applicable testing and procedures requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

(1) None.