

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

12/17/2013

Certified Mail

Mrs. Kim Trostel
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
940 Buckeye Rd
Lima, OH 45802

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | MACT/GACT |
| Yes | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | 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: 0302020013
Permit Number: P0115236
Permit Type: OAC Chapter 3745-31 Modification
County: Allen

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

How to give us feedback on your permitting experience

Please complete a survey at 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 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, Northwest District Office at (419)352-8461 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-NWDO



FINAL

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

BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL

| | |
|----------------|----------------------------------|
| Facility ID: | 0302020013 |
| Permit Number: | P0115236 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 12/17/2013 |
| Effective: | 12/17/2013 |
| Expiration: | 3/21/2022 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL

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Authorization

Facility ID: 0302020013
Application Number(s): A0047909, A0049171
Permit Number: P0115236
Permit Description: Modification to replace the existing vapor recovery unit (VRU) with a Vapor Combustion Unit (VCU) on the truck loading rack (J001).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$750.00
Issue Date: 12/17/2013
Effective Date: 12/17/2013
Expiration Date: 3/21/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
817 W VINE ST
LIMA, OH 45804

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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



Final Permit-to-Install and Operate
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
Permit Number: P0115236
Facility ID: 0302020013
Effective Date: 12/17/2013

Authorization (continued)

Permit Number: P0115236

Permit Description: Modification to replace the existing vapor recovery unit (VRU) with a Vapor Combustion Unit (VCU) on the truck loading rack (J001).

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: | Tank Truck Loadrack |
| Superseded Permit Number: | P0109720 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
Permit Number: P0115236
Facility ID: 0302020013
Effective Date: 12/17/2013

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
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
Permit Number: P0115236
Facility ID: 0302020013
Effective Date: 12/17/2013

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

Area Source MACT/GACT applicability may include, but may not be limited to, 40 CFR Part 63 Subpart BBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities.)



Final Permit-to-Install and Operate
BUCKEYE PARTNERS LLC - LIMA NORTH TERMINAL
Permit Number: P0115236
Facility ID: 0302020013
Effective Date: 12/17/2013

C. Emissions Unit Terms and Conditions



1. J001, Tank Truck Loadrack

Operations, Property and/or Equipment Description:

Tank Truck Loading Rack with a vapor combustion unit (VCU)

- 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. | ORC 3704.03(T) | <u>Gasoline Loading Emissions</u> 35 milligrams (mg) volatile organic compounds (VOC)/liter (L) gasoline loaded <u>Combustion Emissions from VCU</u> 26.6 tons nitrogen oxides (NOx) per month averaged over a 12-month rolling period 14.9 tons carbon monoxide (CO) per month averaged over a 12-month rolling period See b)(2)a. and b)(2)c |
| b. | OAC rule 3745-21-09(Q) | See b)(2)b., c)(1) through c)(6), d)(1), d)(2) and e)(2) |
| c. | 40 CFR, Part 60, Subpart XX [§60.500 – §60.506] | See c)(7) through c)(15) and d)(3) through d)(8) |



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements of this rule will be fulfilled through compliance with 40 CFR Part 60, Subpart XX. ORC 3704.03(T) specifies that BAT shall be equivalent to applicable standards adopted under section 112 of the federal Clean Air Act (CAA). This emissions unit is subject to an area source GACT adopted under CAA section 112 as indicated in B.1.b)(1) – “Facility-Wide Terms and Conditions”. This emissions unit is subject to standards under 40 CFR, Part 60, Subpart XX which are more stringent than the requirements of the applicable area source GACT. Therefore, the BAT requirements under ORC 3704.03(T) will be fulfilled through compliance with 40 CFR Part 60, Subpart XX.
- b. The emission limitations specified pursuant to this rule are less stringent than the requirements established in 40 CFR, Part 60, Subpart XX [New Source Performance Standards (NSPS) for Bulk Gasoline Terminals].
- c. The particulate matter 10 microns or less in size (PM10) and sulfur dioxide (SO₂) emissions are considered to be negligible and will not be included in the permit.

c) Operational Restrictions

- (1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery truck:
 - a. all vapors displaced from the delivery vessel during loading area 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 connected.
- (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.
- (7) The affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.
- (8) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.
- (9) Each vapor collection system shall be designed to prevent any total organic compound vapors collected at one loading rack from passing to another loading rack.
- (10) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
 - a. The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.
 - b. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
 - c. The permittee shall cross-check each tank identification number obtained in paragraph c)(10)b. with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:
 - i. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
 - d. If either the quarterly or semiannual cross-check provided in paragraphs c)(10)c.i. and c)(10)c.ii. reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.
 - e. The permittee shall notify the permittee of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph c)(10)c. and c)(10)d.
 - f. The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.



- (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 rule 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 tank truck vapor tightness documentation required under c)(10)a. above shall be kept on file at the terminal in a permanent form available for inspection.
- (4) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, at a minimum, the following information:
 - a. Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27;
 - b. Tank owner and address;
 - c. Tank identification number;
 - d. Testing location;
 - e. Date of test;
 - f. Tester name and signature;
 - g. Witnessing inspector, if any: Name, signature, and affiliation; and
 - h. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
- (5) The permittee shall maintain records of each monthly leak inspection required under c)(15) for at least two years, and, at a minimum, include the following information:
 - a. Date of inspection;
 - b. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
 - c. Leak determination method;
 - d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days); and
 - e. Inspector name and signature.
- (6) The permittee shall maintain documentation of all notifications required under c)(10)e. on file at the terminal for at least 2 years.
- (7) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.



- (8) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs d)(3), d)(5), and d)(6) above, an owner or operator may comply with the requirements in either paragraph d)(8)a. or d)(8)b:
- a. An electronic copy of each record is instantly available at the terminal.
 - i. The copy of each record in paragraph d)(8)a. is an exact duplicate image of the original paper record with certifying signatures.
 - ii. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph d)(8)a.
 - b. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.
 - i. The copy of each record in paragraph d)(8)b. is an exact duplicate image of the original paper record with certifying signatures.
 - ii. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph d)(8)b. of this section.
- (9) The permittee shall maintain monthly records of the NO_x, and CO emissions from the VCU; and at the end of 12 months of operation, the rolling 12-month summation of NO_x and CO emissions and the average calculated over each rolling 12-month period.

Note: The above records shall be determined in accordance with the emissions calculations presented to the Ohio EPA in the permit application submitted by the permittee.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (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 appropriate Ohio EPA District Office or Local Air Agency) 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.



f) Testing Requirements

- (1) The permittee shall conduct, or have conducted emission testing for this emissions unit in accordance with the following requirements:
 - a. Emissions testing was conducted on November 22, 2013 in accordance with the requirements of f)(1)a. through f)(1)e. below. The emission testing requirements contained in this permit will be considered fulfilled pending approval of the emission testing results submitted in accordance with f)(1)f. below.
 - b. The emission testing shall be conducted to demonstrate compliance with the emission limitation of VOC emissions from the vapor control system shall not exceed 35 mg per liter of gasoline loaded into the delivery system.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): methods and procedures found in OAC rule 3745-21-10(E) and 40 CFR 60.503(a) through (f).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(2) Future testing requirements shall be conducted in accordance with applicable rules, policies, etc. (i.e. Engineering Guide #16, OAC rule 3745-15-04, etc.) Testing time frame(s) specified may be amended or waived upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

(3) 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:

80 mg VOC per liter of gasoline loaded from the vapor control system

Applicable Compliance Method:

Compliance shall be demonstrated through the testing requirements specified in f)(1).

b. Emission Limitation:

26.6 tons nitrogen oxides (NO_x) per month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the ton(s) per month averaged over a 12-month rolling period shall be determined in accordance with the record keeping requirements established in d)(9) above.

c. Emission Limitation:

14.9 tons carbon monoxide (CO) per month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the ton(s) per month averaged over a 12-month rolling period shall be determined in accordance with the record keeping requirements established in d)(9) above.

g) Miscellaneous Requirements

(1) None.