



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

12/14/97

CERTIFIED MAIL

13-18-08-3493

RE: Final Chapter 3745-35 Permit To Operate

CLARK REFINING & MARKETING
Johnna S. Van Keuren
4070 South First Street
St. Louis, MO 63118

Dear Johnna S. Van Keuren:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Cleveland Division of Air Pollution Control at (216) 664-2324.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
Jim Orlemann, DAPC Engineering

US EPA

Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/14/97

Facility ID: 13-18-08-3493

Expiration Date: 12/14/00

FINAL ISSUE

This document constitutes issuance for:

CLARK REFINING & MARKETING
10346 Brecksville Road
Brecksville, OH 44141

of a permit to operate for:

J001 (Loading Rack)

Two bay loading rack used to load gasoline, diesel, ethanol, and fuel additive into tank trucks

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

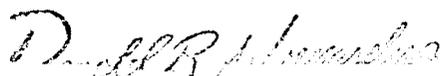
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tank truck loading rack with a flare vapor control system The company identifications for gasoline loading and distillate products loading are bays East and West, respectively.	OAC rule 3745-35-07	Product loading: 0.29 pound of VOC per 1,000 gallons of product loaded into the delivery vessel (35 mg/l); 53.4 tons per year of VOC per rolling, 12-month period. The total annual HAP emissions from this facility shall not exceed 25 tons per year, as a rolling, 12-month summation. (See A.2.a below.) The total annual emissions of any individual HAP from this facility shall not exceed 10 tons per year, as a rolling, 12-month summation. (See A.2.a below.)

2. Additional Terms and Conditions

- 2.a** The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title II of the Clean Air Act, shall not exceed 10 tons per year (TPY) for any individual HAP, and 25 TPY for any combination of HAPs, as rolling, 12-month summations.

B. Operational Restrictions

- Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting the annual throughput of gasoline, distillates, ethanol, fuel additives, and other organic liquids (products). The annual combined throughput of products shall not exceed 365,817,600 gallons. In order to ensure federal enforceability during the first 12 calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations, in gallons:

Month(s)	Maximum Allowable Cumulative Throughput
1	30,484,800
1-2	60,969,600
1-3	91,454,400
1-4	121,939,200
1-5	152,424,000
1-6	182,908,800
1-7	213,393,600
1-8	243,878,400
1-9	274,363,200
1-10	304,848,000
1-11	335,332,800
1-12	365,817,600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation.

- The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any product into tank trucks.

B. Operational Restrictions (continued)

3. a. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - i. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.
 - ii. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
 - b. The loading rack shall be equipped with a vapor control system whereby:

All vapors collected by the vapor collection system are vented to the vapor control system.

 - ii. Any liquid product returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
 - c. A means shall be provided to prevent drainage of product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
 - d. All product loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - e. The permittee shall prohibit product to be spilled, discharged in sewers, stored in open containers or handled in any other manner that would result in evaporation.
 - f. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100% of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
4. A pilot flame shall be maintained at all times in the flare's pilot light burner during the loading of products.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The total, individual throughputs of each product loaded.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughput, in gallons, of all products loaded.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of all products loaded, in gallons.
 - d. The total VOC emissions for this emissions unit.
 - e. The total individual HAP and combined HAP emissions for all emissions units at the facility.
2. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare's pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. This monitoring device shall also include an interlock that prevents the loading of products when the flare's pilot flame is not operational.
3. Each business day, the permittee shall verify that the flare's pilot flame and flame sensor are functioning properly when the emissions unit is in operation. The permittee shall record the results of the daily flare pilot flame and flame sensor inspections.

D. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports which identify any exceedances of the following:
 - a. The maximum allowable cumulative throughput limits for the first 12 calendar months of operation following the issuance of this permit.
 - b. The rolling, 12-month throughput limit for all products.
 - c. The rolling, 12-month emission limitation for VOC.
 - d. All periods during which the flare's pilot flame and flame sensor were not functioning properly when the emissions unit was in operation.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by May 1 and November 1 of each year and shall address the data obtained during the previous 6-month calendar period (January 1 through June 30 and July 1 through December 31, respectively).

2. The permittee shall submit annual reports of the total throughput, in gallons, for all products and the total VOC emissions during the calendar year for this emissions unit, and the total individual HAP and combined HAP emissions for all emissions units at the facility. These annual reports shall be submitted by May 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
2. Emission Limitation: 0.29 pound of VOC per 1,000 gallons of product loaded
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through emission tests. The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E) and specify a minimum of one 6-hour test, during which at least 300,000 liters (79,260 gallons) of gasoline (worst case product) are loaded. (The test should be conducted at the maximum throughput possible.)

Within 12 months prior to the expiration of this permit, the permittee shall conduct or have conducted an emission test(s) for this emissions unit in order to demonstrate continuing compliance with the allowable VOC emission rate. The test shall be done between the months of May and September.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland 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 Cleveland Local Air Agency's refusal to accept the results of the emission test(s).

Personnel from the Cleveland 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.

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 Cleveland Local Air Agency within 30 days following completion of the test(s).

Emission Limitation: 53.4 tons of VOC per year from product loading, as a rolling, 12-month summation
Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C above.

F. Miscellaneous Requirements

1. The following special terms and conditions of this PTO are federally enforceable requirements: A-F