

**Permit To Install Synthetic Minor Write-Up**  
**Fleet Supplies, Inc.**  
**PTI No. 13-03618**

1. Source Description: Fleet Supplies has submitted permit to install applications for conversion of two fixed roof storage tanks into internal floating roof storage tanks.
2. Facility Emissions and Attainment Status: This facility has 47 emissions units which consists of 5 internal floating roof storage tanks, 36 fixed roof and horizontal storage tanks, one gasoline / oil loading rack, one gasoline / oil barge loading station, one volatile organic liquid loading rack, one fugitive dust source and two boilers. Cuyahoga County is designated as attainment for carbon monoxide, ozone, and nitrogen oxides.
3. New Source Emissions: New Source Emissions: a federally enforceable state operating permit was issued to this facility on December 14, 1997 with a facility wide restriction on volume throughput of gasoline, distillates, ethanol and other volatile organic liquids. The facility wide gasoline volume throughput is restricted to 110,000,000 gallons per year. Based upon 8760 hours per year, maximum gasoline volume throughput, the emissions of these two internal floating roof storage tanks combining with emissions generated by other emissions units will have a maximum potential VOC emissions exceeding the facility wide allowable emissions of less than 100.0 tons VOC per year.

The facility wide VOC emissions will be restricted to less than 100.0 TPY VOC by operational restriction on the volume throughput of the two storage tanks and the subsequent 12-month rolling throughput of the most volatile organic liquid, gasoline.

The permittee shall submit semi-annual written reports on volume throughput of gasoline for each of the two storage tanks and all periods when the 12-month rolling volume throughput exceeded the operational restriction limitations.

By restricting the volume throughput of gasoline the VOC emissions will be restricted and in turn the HAP emissions will also be restricted. The sources of HAP emissions are the components of gasoline and the organic solvent loading rack. The potential individual HAP emissions are 7.03 TPY. The potential combined HAP emissions are 12.87 TPY.

4. Conclusion: With the enforceable permit terms and conditions limiting the total operation, this permit is a "Synthetic Minor" and, therefore, not subject to Title V permitting requirements.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY**

**CERTIFIED MAIL**

**Application No: 13-03618**

**DATE: 9/14/2000**

Fleet Supplies, Inc.  
CHARLES BACON  
PO Box 93831 250 Mahoning Avenue  
Cleveland, OH 44101-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1500** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA

CBAPC

PA



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-03618**

Application Number: 13-03618  
APS Premise Number: 1318005897  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Fleet Supplies, Inc.  
Person to Contact: CHARLES BACON  
Address: PO Box 93831 250 Mahoning Avenue  
Cleveland, OH 44101-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**250 Mahoning Avenue  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**converting two fixed roof storage tanks into two internal floating roof petroleum liquid storage tanks.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. 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.)

**3. 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 five 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 this permit. Such records may be maintained in computerized form.

**4. 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 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.

**5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

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

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

**Fleet Supplies, Inc.**  
**PTI Application: 13-03618**

**Facility ID: 1318005897**

**Issued: To be entered upon final issuance**

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**Fleet Supplies, Inc.**  
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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	7.09

Fleet

PTI /

Emissions Unit ID: T013

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
T013 - converting a 2,820,000 gallon fixed roof storage tank into an internal floating roof petroleum liquid storage tank with two floating roof seal. Company identification is Tank 18120.	OAC rule 3745-31-05 (A)(3)	3.86 TPY VOC (Volatile Organic Compounds)
	OAC rule 3745-31-05 (D) Synthetic minor to avoid Title V permitting	3.86 TPY VOC, as a rolling 12-month summation
	OAC rule 3745-21-09 (L)	Less stringent than OAC rule 3745-31-05 (A)(3)
	40 CFR Part 60, Subpart Kb	See Part II, Section C.2.

**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 III of the Clean Air Act, shall not exceed 10 TPY for any individual HAP, and 25 TPY for any combination of HAPs, as rolling, 12-month summations.
- 2.b The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

- 2.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.

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PTI /

Emissions Unit ID: T013

Issued: To be entered upon final issuance

**B. Operational Restrictions**

1. The fixed roof storage tank shall be equipped with an internal floating roof.
2. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
3. 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.
4. The annual throughput of petroleum liquids shall not exceed 50,000,000 gallons based upon a rolling, 12-month summation of the petroleum liquids throughput amounts.
5. A Federally Enforceable State Operating Permit was issued to this facility on December 14, 1997. The plant wide volume throughput of petroleum liquids, ethanol, and distillates is operationally restricted.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain records of the following information when this emissions unit is in operation:
  - a. The types of petroleum liquids and/or VOC/HAP materials stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.
2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each emissions unit.

Source number:

tank size:

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Emissions Unit ID: **T013**

**Issued: To be entered upon final issuance**

T013

2,820,000 gallons

3. The permittee collect and record the following information for each month the emissions unit is in operation:
  - a. Gallons of petroleum liquids and/or VOC/HAP materials stored in this emissions unit;
  - b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative volume throughput for each calendar month;
  - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the volume throughput of petroleum liquids (i.e., the monthly value from (a) added to the total petroleum liquids throughput for the previous 11-month period);
  - d. The VOC/HAP emissions, in pounds and in tons, from this emissions unit;
  - e. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
  - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions (i.e., the monthly value from (d) added to the total VOC emissions for the previous 11-month period).
  
4. All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

#### **D. Reporting Requirements**

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669

**Fleet Supplies, Inc.**  
**PTI Application 13-03618**  
**Issue**

**Facility ID: 1318005897**

Columbus, OH 43216-3669

Emissions Unit ID: **T013**

and  
Cleveland Air Pollution Control  
1925 St. Clair Avenue  
Cleveland, OH 44114

**Fleet**

**PTI /**

Emissions Unit ID: **T013**

**Issued: To be entered upon final issuance**

2. The permittee shall submit a deviation (excursion) report that identifies any exceedances of the rolling 12-month throughput limitation, as well as the corrective actions that were taken to achieve compliance. This written report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence of the deviation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for VOC. This written report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence of the deviation.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation: 3.86 TPY VOC

Applicable Compliance Method:

Calculation of the monthly and rolling 12-month emissions using a current version of U.S. EPA's TANKS software program.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Part II, Section A.2.a, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in TPY) for all petroleum liquids VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the petroleum liquids. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
  - a. The HAP emissions from petroleum liquids tank truck loading and storage shall be determined using the following emission factors:
    - i. benzene - 0.0100 pound of benzene emissions per pound of VOC emissions;
    - ii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
    - iii. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
    - iv. ethyl benzene - 0.0010 pound of ethyl benzene emissions per pound of VOC emissions;
    - v. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions;
    - vi. 2,2,4 trimethylpentane - 0.0080 pound of 2,2,4 trimethylpentane per pound VOC

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**PTI /**

Emissions Unit ID: **T013**

**Issued: To be entered upon final issuance**

- vii. emissions; and methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.
- b. The HAP emissions from petroleum liquids tank truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated emission rates for each individual HAP.

**F. Miscellaneous Requirements**

None.

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PTI /

Emissions Unit ID: T016

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(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 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>
T016 - converting a 4,064,000 gallon fixed roof storage tank into an internal floating roof petroleum liquid storage tank with two floating roof seals. Company identification is Tank 18123.	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-31-05 (D) Synthetic minor to avoid Title V permitting  OAC rule 3745-21-09 (L)  40 CFR Part 60, Subpart Kb	3.23 TPY VOC (Volatile Organic Compounds)  3.23 TPY VOC, as a rolling 12-month summation  Less stringent than OAC rule 3745-31-05 (A)(3)  See Part II, Section C.2.

**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 III of the Clean Air Act, shall not exceed 10 TPY for any individual HAP, and 25 TPY for any combination of HAPs, as rolling, 12-month summations.
- 2.b The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

Emissions Unit ID: T016

- 2.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.

**B. Operational Restrictions**

1. The fixed roof storage tank shall be equipped with an internal floating roof.
2. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
3. 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.
4. The annual throughput of petroleum liquids shall not exceed 50,000,000 gallons based upon a rolling, 12-month summation of the petroleum liquids throughput amounts.
5. A Federally Enforceable State Operating Permit was issued to this facility on December 14, 1997. The plant wide volume throughput of petroleum liquids, ethanol, and distillates is operationally restricted.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain records of the following information when this emissions unit is in operation:
  - a. The types of petroleum liquids and/or VOC/HAP materials stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.
2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each emissions unit.

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Issued: To be entered upon final issuance

Emissions Unit ID: T016

Source number:	tank size:
T016	4,064,000 gallons

3. The permittee collect and record the following information for each month the emissions unit is in operation:
  - a. Gallons of petroleum liquids and/or VOC/HAP materials stored in this emissions unit;
  - b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative volume throughput for each calendar month;
  - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the volume throughput of petroleum liquids (i.e., the monthly value from (a) added to the total petroleum liquids throughput for the previous 11-month period);
  - d. The VOC/HAP emissions, in pounds and in tons, from this emissions unit;
  - e. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
  - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions (i.e., the monthly value from (d) added to the total VOC emissions for the previous 11-month period).
4. All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

#### **D. Reporting Requirements**

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

**Fleet Supplies, Inc.**  
**PTI Application 13-03618**  
**Issue**

**Facility ID: 1318005897**

**Emissions Unit ID: T016**

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, OH 43216-3669

and  
Cleveland Air Pollution Control  
1925 St. Clair Avenue  
Cleveland, OH 44114

**Issued: To be entered upon final issuance**

2. The permittee shall submit a deviation (excursion) report that identifies any exceedances of the rolling 12-month throughput limitation, as well as the corrective actions that were taken to achieve compliance. This written report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence of the deviation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for VOC. This written report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence of the deviation.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation: 3.23 TPY VOC

Applicable Compliance Method:

Calculation of the monthly and rolling 12-month emissions using a current version of U.S. EPA's TANKS software program.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Part II, Section A.2.a, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in TPY) for all petroleum liquids VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the petroleum liquids. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
  - a. The HAP emissions from petroleum liquids tank truck loading and storage shall be determined using the following emission factors:
    - i. benzene - 0.0100 pound of benzene emissions per pound of VOC emissions;
    - ii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
    - iii. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
    - iv. ethyl benzene - 0.0010 pound of ethyl benzene emissions per pound of VOC emissions;
    - v. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions;

**Fleet**

**PTI /**

Emissions Unit ID: **T016**

**Issued: To be entered upon final issuance**

- vi. 2,2,4 trimethylpentane - 0.0080 pound of 2,2,4 trimethylpentane per pound VOC emissions; and
- vii. methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.

**Fleet**

**PTI /**

Emissions Unit ID: **T016**

**Issued: To be entered upon final issuance**

- b. The HAP emissions from petroleum liquids tank truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated emission rates for each individual HAP.

**F. Miscellaneous Requirements**

None.

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03618 Facility ID: 1318005897

FACILITY NAME Fleet Supplies, Inc.

FACILITY DESCRIPTION converting two fixed roof storage tanks CITY/TWP Cleveland

Emissions Unit ID: T016

SIC CODE 4226 SCC CODE 4-04-001-72; 4-04-001-78 EMISSIONS UNIT ID T013

EMISSIONS UNIT DESCRIPTION converting a 2,820,000 gallon fixed roof storage tank into an internal floating roof petroleum liquid storage tank with two floating roof seal. Company identification is Tank 18120.

DATE INSTALLED 04/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment		3.84		3.86
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subpart Kb NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination for this emissions unit is internal floating roof with two floating roof seals

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**24 NEW SOURCE REVIEW FORM B**

PTI Number: 13-03618 Facility ID: 1318005897

FACILITY NAME Fleet Supplies, Inc.

FACILITY DESCRIPTION converting two fixed roof storage tanks CITY/TWP Cleveland

Emissions Unit ID: **T016**

SIC CODE 4226 SCC CODE 4-04-001-72; 4-04-001-78 EMISSIONS UNIT ID T016

EMISSIONS UNIT DESCRIPTION converting a 4,064,000 gallon fixed roof storage tank into an internal floating roof petroleum liquid storage tank with two floating roof seals. Company identification is Tank 18123.

DATE INSTALLED 04/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment		3.20		3.23
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Subpart Kb** NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination for this emissions unit is internal floating roof with two floating roof seals

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03618

Facility ID: 1318005897

FACILITY NAME Fleet Supplies, Inc.

FACILITY DESCRIPTION converting two fixed roof storage tanks CITY/TWP Cleveland

Emissions Unit ID: T016

**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

**Tanks Program Output**

**Please provide any additional permit specific notes as you deem necessary:**

The "Subpart Kb" was merged into the "NESHAP" cell in the New Source Review Form B. The "Subpart Kb" was moved back to "NSPS" cell.

**Permit To Install Synthetic Minor Write-Up**

4. Source Description: Fleet Supplies has submitted permit to install applications for conversion of two fixed roof storage tanks into internal floating roof storage tanks.
5. Facility Emissions and Attainment Status: This facility has 47 emissions units which consists of 5 internal floating roof storage tanks, 36 fixed roof and horizontal storage tanks, one gasoline / oil loading rack, one gasoline / oil barge loading station, one volatile organic liquid loading rack, one fugitive dust source and two boilers. Cuyahoga County is designated as attainment for carbon monoxide, ozone, and nitrogen oxides.
6. New Source Emissions: New Source Emissions: a federally enforceable state operating permit was issued to this facility on December 14, 1997 with a facility wide restriction on volume throughput of gasoline, distillates, ethanol and other volatile organic liquids. The facility wide gasoline volume throughput is restricted to 110,000,000 gallons per year. Based upon 8760 hours per year, maximum gasoline volume throughput, the emissions of these two internal floating roof storage tanks combining with emissions generated by other emissions units will have a maximum potential VOC emissions exceeding the facility wide allowable emissions of less than 100.0 tons VOC per year.

The facility wide VOC emissions will be restricted to less than 100.0 TPY VOC by operational restriction on the volume throughput of the two storage tanks and the subsequent 12-month rolling throughput of the most volatile organic liquid, gasoline.

The permittee shall submit semi-annual written reports on volume throughput of gasoline for each of the two storage tanks and all periods when the 12-month rolling volume throughput exceeded the operational restriction limitations.

By restricting the volume throughput of gasoline the VOC emissions will be restricted and in turn the HAP emissions will also be restricted. The sources of HAP emissions are the components of gasoline and the organic

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PTI Num

**FACILITY**

Emissions Unit ID: **T016**

**FACILITY DESCRIPTION**

converting two fixed roof storage tanks  
into two internal floating roof petroleum  
liquid storage tanks

CITY/TWP Cleveland

solvent loading rack. The potential individual HAP emissions are 7.03 TPY. The potential combined HAP emissions are 12.87 TPY.

- 7. Conclusion: With the enforceable permit terms and conditions limiting the total operation, this permit is a "Synthetic Minor" and, therefore, not subject to Title V permitting requirements.

Please fill in the following for this permit:

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

**Pollutant**

**Tons Per Year**

VOC

7.09