John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

2/27/2014

Certified Mail

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

Andrew Miller
Ashtabula Energy LLC
1001 Texas Ave
Suite 1400
Houston, TX 77002

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

Facility ID: 0204012012
Permit Number: P0115688
Permit Type: Initial Installation
County: Ashtabula

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Ashtabula Energy is proposing a gas-to-liquids facility located in Ashtabula, Ashtabula County, Ohio. The facility will produce LPG, naphtha, diesel, and lube oil from natural gas.

3. Facility Emissions and Attainment Status:

   Ashtabula County is marginal nonattainment for ozone. The facility will include the following emissions:

Pollutant	Tons Per Year (tpy)	Source(s)
NOx	79.7	Natural gas-fired heaters (B001-B004), process flare (P001)
CO	79.0	Natural gas-fired heaters (B001-B004), process flare (P001), catalyst regen system (P002)
OC	45.0	Natural gas-fired heaters (B001-B004), petroleum loading racks (J001, J003, J005), facility-wide fugitive emissions (F002), petroleum storage tanks (T001-T016)
PE	7.6	Natural gas-fired heaters (B001-B004), process flare (P001), Roadways/Parking Areas (F001)

4. Source Emissions:

Emissions Unit	Pollutant	Tons per year (tpy)
B001	NOx CO OC PE	14.1 23.7 3.1 2.2
B002	NOx CO OC PE	4.2 7.0 1.0 0.6
B003	NOx CO OC PE	4.6 7.7 1.0 0.7

B004	NOx CO OC PE	11.8 19.8 2.6 4.8
F001	PE	Fugitive visible emission limit
F002	OC (VOC)	11.0
J001	OC (VOC)	4.8
J003	OC (VOC)	1.5
J005	OC (VOC)	4.8
P001	NOx CO PE	7.1 19.0 0.3
P002	CO	1.8
T001-T016	OC (VOC)	15.2

5. Conclusion:

This facility will not trigger the thresholds for Title V or MACT.

6. Please provide additional notes or comments as necessary:

NOx modeling was submitted with the PTIO application. The NOx modeling indicates passing results.

J003 (Naphtha Loading Rack):

In order to ensure that VOC emissions are controlled with a flare, interlock controls are utilized. If the flare is not operational then the interlock controls shall not allow the loading of naphtha at the loading rack.

Since the loading rack will not operate without the flare through interlock controls (normal startup and flame detection), the potential to emit for this emissions unit is based on the maximum, controlled rate of VOC emissions.

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

Pollutant	Tons Per Year
NOx	79.7
CO	79.0
OC	45.0
PE	5.6

PUBLIC NOTICE
2/27/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Ashtabula Energy LLC
Lake (SR531) RD E,
Ashtabula, OH 44004
Ashtabula County
FACILITY DESC.: Petrochemical Manufacturing
PERMIT #: P0115688
PERMIT TYPE: Initial Installation
PERMIT DESC: PTIO for the initial installation of a gas-to-liquids facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Corey Kurjian, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Ashtabula Energy LLC

Facility ID:	0204012012
Permit Number:	P0115688
Permit Type:	Initial Installation
Issued:	2/27/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Ashtabula Energy LLC

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Authorization

Facility ID: 0204012012
Application Number(s): A0048954
Permit Number: P0115688
Permit Description: PTIO for the initial installation of a gas-to-liquids facility.
Permit Type: Initial Installation
Permit Fee: $10,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/27/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Ashtabula Energy LLC
Lake (SR531) RD E
Ashtabula, OH 44004

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0115688
Permit Description: PTIO for the initial installation of a gas-to-liquids facility.

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

Emissions Unit ID:	**B001**
Company Equipment ID:	H-300
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B002**
Company Equipment ID:	H-600
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B003**
Company Equipment ID:	H-700
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B004**
Company Equipment ID:	PK2410
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F001**
Company Equipment ID:	Paved Roadways and Parking Areas
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F002**
Company Equipment ID:	Fugitive VOC Emissions
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J001**
Company Equipment ID:	Rail Car Diesel Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J003**
Company Equipment ID:	Naphtha Truck Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J005**
Company Equipment ID:	Diesel Truck Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	Main Process
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID: **P002**
Company Equipment ID: Catalyst Regen System
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T001**
Company Equipment ID: Diesel Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T002**
Company Equipment ID: Diesel Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T003**
Company Equipment ID: Diesel Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T004**
Company Equipment ID: Diesel Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T005**
Company Equipment ID: Naphtha Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T006**
Company Equipment ID: Naphtha Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T007**
Company Equipment ID: Lube Oil Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T008**
Company Equipment ID: Lube Oil Storage Tank
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T009**
Company Equipment ID: Lube Oil Tank Farm
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T010**
Company Equipment ID: Lube Oil Tank Farm
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T011**
Company Equipment ID: Lube Oil Tank Farm
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID:	**T012**
Company Equipment ID:	Lube Oil Tank Farm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T013**
Company Equipment ID:	Lube Oil Tank Farm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T014**
Company Equipment ID:	Lube Oil Tank Farm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T015**
Company Equipment ID:	Lube Oil Tank Farm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T016**
Company Equipment ID:	Lube Oil Tank Farm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) None.

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

C. Emissions Unit Terms and Conditions

1. B001, 66 mmBtu/hr Natural Gas Fired Reformer Heater

Operations, Property and/or Equipment Description:

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)	Nitrogen oxides (NO_x) emissions shall not exceed 0.049 lb/mmBtu. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu.
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Organic compounds (OC) emissions shall not exceed 0.0108 lb/mmBtu. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1). See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. This emission limitation shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
f.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the SIP.

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

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NO_x emissions shall not exceed 0.049 lb/mmBtu.

Applicable Compliance Method:

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

b. Emission Limitation:

CO emissions shall not exceed 0.082 lb/mmBtu.

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 0.0075 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10). Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

OC emissions shall not exceed 0.0108 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See b)(1)d.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

2. B002, 19.6 mmBtu/hr Natural Gas Fired Reactor Charge Heater

Operations, Property and/or Equipment Description:

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO_x) emissions shall not exceed 0.049 lb/mmBtu. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu. Organic compounds (OC) emissions shall not exceed 0.0108 lb/mmBtu. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1). See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. This emission limitation shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
e.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO and OC emissions from this emissions unit since the "uncontrolled" potential to emit is less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NO_x emissions shall not exceed 0.049 lb/mmBtu.

Applicable Compliance Method:

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

b. Emission Limitation:

CO emissions shall not exceed 0.082 lb/mmBtu.

Applicable Compliance Method:

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

c. Emission Limitation:

OC emissions shall not exceed 0.0108 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See b)(1)c.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

3. B003, 21.4 mmBtu/hr Natural Gas Fired Fractionator Heater

Operations, Property and/or Equipment Description:

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO_x) emissions shall not exceed 0.049 lb/mmBtu. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu. Organic compounds (OC) emissions shall not exceed 0.0108 lb/mmBtu. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1). See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. This emission limitation shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
e.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO and OC emissions from this emissions unit since the "uncontrolled" potential to emit is less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NO_x emissions shall not exceed 0.049 lb/mmBtu.

Applicable Compliance Method:

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

b. Emission Limitation:

CO emissions shall not exceed 0.082 lb/mmBtu.

Applicable Compliance Method:

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

c. Emission Limitation:

OC emissions shall not exceed 0.0108 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See b)(1)c.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

4. B004, 55 mmBtu/hr Natural Gas Fired Steam Startup Boiler

Operations, Property and/or Equipment Description:

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)	Nitrogen oxides (NO_x) emissions shall not exceed 0.049 lb/mmBtu. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu.
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Organic compounds (OC) emissions shall not exceed 0.0108 lb/mmBtu. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1). See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. This emission limitation shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
f.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).
g.	40 CFR Part 60, Subpart Dc Standards of Performance (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units	See d)(2), d)(3), d)(4), d)(5) and e)(3).
h.	40 CFR Part 63, Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	Exempt. See b)(2)d.

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves

the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the SIP.

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

d. Pursuant to 40 CFR Part 63, Subpart JJJJJJ, § 63.11195(e), gas-fired boilers are not subject to this rule.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) Except as provided under paragraphs (g)(2) and (g)(3) of 40 CFR Part 60, Subpart Dc, section §60.48c, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of section §60.48c, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(4) As an alternative to meeting the requirements of paragraph (g)(1) of section §60.48c, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42c to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

(5) All records required under section §60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) The reporting period for the reports required under 40 CFR Part 60, Subpart Dc is each 6-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NO_x emissions shall not exceed 0.049 lb/mmBtu.

Applicable Compliance Method:

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

b. Emission Limitation:

CO emissions shall not exceed 0.082 lb/mmBtu.

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 0.0075 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

OC emissions shall not exceed 0.0108 lb/mmBtu.

Applicable Compliance Method:

If required, compliance with the short-term emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See b)(1)d.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.

5. F001, Paved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Paved Roadways and Parking Areas

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	No visible particulate emissions (PE) except for 1 minute during any 60-minute period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period. This emission limitation shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
d.	OAC rule 3745-17-08(B)	See b)(2)c through b)(2)g.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the visible particulate emission limitation from this emissions unit since the "uncontrolled" potential to emit for PE is less than ten tons per year.

c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

f. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

paved roadways and parking areas	minimum inspection frequency
all roads and parking areas	daily

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

6. F002, Fugitive VOC Emissions

Operations, Property and/or Equipment Description:

Facility-Wide Fugitive VOC Emissions

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)	The control measures and work practices outlined in paragraphs b)(2)a. through b)(2)f.

(2) Additional Terms and Conditions

a. For any transfer of petroleum distillate from the storage tanks to the loading rack and from the loading rack to the delivery vessel (tanker truck), the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line from the tanker truck to the unloading rack and a means to ensure that the vapor line is connected before crude oil is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the loading process back to the tanker truck.

b. All crude oil loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

c. All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.

d. The delivery vessel hatches shall be closed at all times during the unloading of the delivery vessel.

e. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

f. The aforementioned control measures and work practices will reduce the volatile organic compounds (VOC) to less than or equal to 11.0 tons per year.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) Leak Detection and Repair Program

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

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

ii. The analyzer shall be operated and maintained following the instrument manufacturer's operation and maintenance instructions.

iii. A leak shall be determined if the instrument reading is equal to or greater than 10,000 ppm total VOC or the "leak detected" instrument reading required per any applicable rule.

iv. Documentation that includes the following:

(a) the date the inspection was conducted;

(b) the name of the employee conducting the leak check;

(c) the identification of any component that was determined to be leaking; and

(d) the date the component was repaired and determined to no longer be leaking.

b. The records associated with the leak detection and repair program shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(2) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.

(3) While crude oil is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. the date of inspection;

b. the leak detection method;

c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and

f. the inspector's name and signature.

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

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.

(3) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

7. J001, Rail Car Diesel Loading Rack

Operations, Property and/or Equipment Description:

Rail Car Diesel Loading Rack with Two 600 GPM Arms

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.4 ton per month averaged over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation

Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the SIP.

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

c) Operational Restrictions

(1) For any transfer of petroleum distillate from the loading rack to a railcar, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line for the loading loading of the railcar and a means to ensure that the vapor line is connected before petroleum distillate is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the transfer of petroleum distillate from the railcar back to the loading rack.

(2) All petroleum distillate loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

(3) All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.

(4) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.

(5) There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

(6) The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of petroleum distillate.

d) Monitoring and/or Recordkeeping Requirements

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

a. the total throughput of distillate, in gallons, for each month for the facility;

b. the cumulative total throughput of distillate, in gallons, for each calendar month;

c. the rolling, 12-month summation of the total distillate throughputs, in gallons; and

d. monthly VOC emissions are calculated by multiplying the monthly total throughput of distillate by the emission factor of 0.014 lb of VOC per thousand gallons of distillates (AP-42, Chapter 5.2, Table 5.2-5).

(2) The permittee shall maintain monthly records of the VOC emissions from this emissions unit and the average calculated over each rolling, 12-month period.

(3) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.

(4) While petroleum distillate is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. the date of inspection;

b. the leak detection method;

c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and

f. the inspector's name and signature.

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

(5) The permittee shall collect and maintain monthly records of the throughput of petroleum distillate for each month, in gallons.

(6) The permittee shall maintain records of percent individual and total combined HAP content of all petroleum distillate loaded on a monthly basis.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.

(3) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 0.4 ton per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance for each rolling, 12-month period shall be demonstrated by adding the monthly VOC emissions, as determined in d)(1)d above and dividing by twelve (12).

b. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

8. J003, Naphtha Truck Loading Rack

Operations, Property and/or Equipment Description:

Naphtha Truck Loading Rack Containing Two 600 GPM Arms with Flare

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Carbon monoxide (CO) emissions shall not exceed 0.55 lb/mmBtu. Nitrogen oxide (NO_x) emissions shall not exceed 0.138 lb/mmBtu. Sulfur dioxide (SO_2) emissions shall not exceed 0.00056 lb/mmBtu. Particulate emissions (PE) shall not exceed 0.0059 lb/mmBtu. Organic compound (OC) emissions shall not exceed 0.14 lb/mmBtu. See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO_x, SO_2, PE and OC from this air contaminant source since the controlled potential to emit for CO, NO_x, SO_2, PE and OC is less than 10 tons/yr.

c. In order to ensure that VOC emissions are controlled with a flare, interlock controls are utilized. If the flare is not operational then the interlock controls shall not allow the loading of naphtha at the loading rack.

Since the loading rack will not operate without the flare through interlock controls (normal startup and flame detection), the potential to emit for this emissions unit is based on the maximum, controlled rate of VOC emissions.

d. According to the permit application, the maximum heat release rate capacity of the loading flare is 2.48 mmBtu/hr.

c) Operational Restrictions

(1) For any transfer of naphtha from a railcar to a tanker truck, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line for the loading of the tanker truck and a means to ensure that the vapor line is connected before naphtha is transferred. The vapor balance system shall be designed and operated to route at least 100 percent of displaced vapors from the transfer of naphtha from the storage tanks to the tanker truck.

(2) All naphtha loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

(3) All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.

(4) The delivery vessel hatches shall be closed at all times during the unloading of the delivery vessel.

(5) There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

(6) The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of naphtha.

(7) The permittee shall operate and maintain an interlocking device that does not allow this emissions unit to start-up or operate unless the flare is operational.

(8) The maximum heat release rate capacity of the flare shall not exceed 2.48 mmBtu/hr.

(9) This emissions unit shall be equipped with a flare to control OC emissions. The flare shall be fired with natural gas and shall be operated with at least 98% control efficiency.

(10) The flare shall be designed and operated with no visible emissions, as determined by 40 CFR §60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

(11) The flare shall be operated with flame present at all times, as determined by the methods specified in by 40 CFR §60.18(f).

(12) The flare shall be used only when the net heating value of the gas being combusted is 200 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR §60.18(f).

(13) The flare shall be designed and operated with an exit velocity that satisfies the requirements of 40 CFR §60.18.

(14) The flare shall be operated at all times when emissions may be vented to it.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.

(2) While naphtha is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. the date of the inspection;

b. the leak detection method;

c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and

f. the inspector's name and signature.

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

(3) The permittee shall collect and maintain monthly records of the throughput of naphtha for each month, in gallons.

(4) The permittee shall monitor the flare and interlock control(s) to ensure that they are operated when the emissions unit is in operation.

(5) The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

(6) The permittee shall, on a quarterly basis, test the interlock system to ensure that the emissions unit does shut down when the flare is not operational.

The permittee shall maintain records of the quarterly tests of the interlock system.

(7) The permittee shall record the following information each month:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment and the associated emissions units.

(8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

(9) For each day during which the flare burns a fuel other than natural gas, the permittee shall maintain a record of the types and quantities of fuel burned in the emissions unit.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.

(3) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

(4) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of all periods of time when the interlock system was activated and the emissions unit was not shut down.

(5) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER each day that naphtha is transferred via the loading rack and the flare was not in operation.

(6) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER (a) identify all days during which any visible particulate emissions were observed from the flare serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

CO emissions shall not exceed 0.55 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.37 lb/mmBtu specified in AP-42, Section 13, Table 13.5-1.

If required, CO emissions shall be demonstrated according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

b. Emission Limitation:

NO_x emissions shall not exceed 0.138 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.138 lb/mmBtu specified in TNRCC RG-109 “Air Permits Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers”, Table 4.

If required, NO_x emissions shall be demonstrated according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

c. Emission Limitation:

SO_2 emissions shall not exceed 0.00056 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be demonstrated based upon an emission factor of 0.00054 lb/mmBtu calculated by the following:

[(standard sulfur content of 2,000 gr/mmscf / 7,000 gr/lb) * (sulfur MW of 64.06 lb/lbmol / SO2 MW of 32.07 lb/lbmol)] / heating value of natural gas of 1,050 BTU/cubic foot.

If required, SO_2 emissions shall be demonstrated according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

d. Emission Limitation:

PE shall not exceed 0.0059 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.0059 lb/mmBtu specified in AP-42 section 1.4, table 1.4-2, 7/1998).

If required, particulate emissions shall be demonstrated according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

e. Emission Limitation:

OC emissions shall not exceed 0.14 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.14 lb/mmBtu specified in AP-42, Section 13, Table 13.5-1.

f. Emission Limitation:

There shall be no visible emissions from the flare, except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

g) Miscellaneous Requirements

(1) None.

9. J005, Diesel Truck Loading Rack

Operations, Property and/or Equipment Description:

Diesel Truck Loading Rack with Two 600 GPM Arms

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.4 ton per month averaged over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation

Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the SIP.

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

c) Operational Restrictions

(1) For any transfer of petroleum distillate from the loading rack to a railcar, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line for the loading loading of the railcar and a means to ensure that the vapor line is connected before petroleum distillate is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the transfer of petroleum distillate from the railcar back to the loading rack.

(2) All petroleum distillate loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

(3) All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.

(4) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.

(5) There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

(6) The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of petroleum distillate.

d) Monitoring and/or Recordkeeping Requirements

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

a. the total throughput of distillate, in gallons, for each month for the facility;

b. the cumulative total throughput of distillate, in gallons, for each calendar month;

c. the rolling, 12-month summation of the total distillate throughputs, in gallons; and

d. monthly VOC emissions are calculated by multiplying the monthly total throughput of distillate by the emission factor of 0.014 lb of VOC per thousand gallons of distillates (AP-42, Chapter 5.2, Table 5.2-5).

(2) The permittee shall maintain monthly records of the VOC emissions from this emissions unit and the average calculated over each rolling, 12-month period.

(3) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.

(4) While petroleum distillate is being loaded, the permittee shall monitor the vapor balance system and ancillary equipment for leaks. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. the date of inspection;

b. the leak detection method;

c. the findings of the inspection, which shall indicate the location, nature, and severity of each leak (or may indicate no leak found);

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days, from the time of detection to the date of final repair; and

f. the inspector's name and signature.

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

(5) The permittee shall collect and maintain monthly records of the throughput of petroleum distillate for each month, in gallons.

(6) The permittee shall maintain records of percent individual and total combined HAP content of all petroleum distillate loaded on a monthly basis.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER each day that crude oil is transferred via the loading rack and the vapor balance system was not in operation.

(3) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of any leaks in vapor or liquid lines that are not repaired within fifteen days after identification (in accordance with d)(2)).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 0.4 ton per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance for each rolling, 12-month period shall be demonstrated by adding the monthly VOC emissions, as determined in d)(1)d above and dividing by twelve (12).

b. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

10. P001, Main Process

Operations, Property and/or Equipment Description:

Main Process: Autothermal reforming, FT Reaction, and Hydroprocessing with flare

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)	Carbon monoxide (CO) emissions shall not exceed 0.37 lb/mmBtu.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxide (NO_x) emissions shall not exceed 0.138 lb/mmBtu. Sulfur dioxide (SO_2) emissions shall not exceed 0.00056 lb/mmBtu. Particulate emissions (PE) shall not exceed 0.0059 lb/mmBtu. See b)(2)a and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, SO_2 and PE from this air contaminant source since the uncontrolled potential to emit for NO_x, SO_2 and PE is less than 10 tons/yr.

c. According to the permit application, the flare operates during startup, shutdown and emergency/malfunction events. The worse-case design of the flare is 1140 mmBtu/hr which would result from a malfunction or emergency event. The flare would operate at 200 mmBtu/hr during startup and shutdown events. Potential-to-emit (PTE) was quantified by multiplying the maximum flare rating of 1140 mmBtu/hr by 90 hours which is equivalent to 24 hours per year of emergency/malfunction emissions and 376 hours per year of startup and shutdown emissions.

c) Operational Restrictions

(1) The flare shall not operate more than 24 hours per year during emergency/malfunction events, which is equivalent to 1140 mmBtu/hr (maximum rating of flare).

(2) The flare shall not operate more than 376 hours per year during startup and shutdown events, which is equivalent to 200 mmBtu/hr.

(3) This emissions unit shall be equipped with a flare to control OC emissions. The flare shall be fired with natural gas and shall be operated with at least 98% control efficiency.

(4) The flare shall be designed and operated with no visible emissions, as determined by 40 CFR §60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

(5) The flare shall be operated with flame present at all times, as determined by the methods specified in by 40 CFR §60.18(f).

(6) The flare shall be used only when the net heating value of the gas being combusted is 200 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR §60.18(f).

(7) The flare shall be designed and operated with an exit velocity that satisfies the requirements of 40 CFR §60.18.

(8) The flare shall be operated at all times when emissions may be vented to it.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the flare to ensure that it is operated when the emissions unit is in operation.

(2) The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

(3) The permittee shall record the following information each month:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, reason for flare operation (i.e., startup, shutdown, and/or emergency/malfunction) and the monitoring equipment.

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

(5) For each day during which the flare burns a fuel other than natural gas, the permittee shall maintain a record of the types and quantities of fuel burned in the emissions unit.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of the following:

a. each day that the flare burned a fuel other than natural gas;

b. all periods during which there was no pilot flame;

c. the operating times for the flare, reason for flare operation (i.e., startup, shutdown, and/or emergency/malfunction) and the monitoring equipment;

d. all periods that there were emissions from this emissions unit but the flare was not in operation;

e. all periods that the flare operated in excess of 24 hours per year during emergency/malfunction events, which is equivalent to 1140 mmBtu/hr (maximum rating of flare);

f. all periods that the flare operated in excess of 376 hours per year during startup and shutdown events, which is equivalent to 200 mmBtu/hr; and

g. all days during which any visible particulate emissions were observed from the flare serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

CO emissions shall not exceed 0.37 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.37 lb/mmBtu specified in AP-42, Section 13, Table 13.5-1.

If required, CO emissions shall be demonstrated according to test Methods 1 - 4 and 10 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

b. Emission Limitation:

NO_x emissions shall not exceed 0.138 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.138 lb/mmBtu specified in TNRCC RG-109 “Air Permits Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers”, Table 4.

If required, NO_x emissions shall be demonstrated according to test Methods 1 - 4 and 7 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

c. Emission Limitation:

SO_2 emissions shall not exceed 0.00056 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be based upon an emission factor of 0.00054 lb/million BTU calculated by the following:

[(standard sulfur content of 2,000 gr/mmscf / 7,000 gr/lb) * (sulfur MW of 64.06 lb/lbmol / SO2 MW of 32.07 lb/lbmol)] / heating value of natural gas of 1,050 BTU/cubic foot.

If required, SO_2 emissions shall be demonstrated according to test Methods 1 - 4 and 6 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

d. Emission Limitation:

PE shall not exceed 0.0059 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 0.0059 lb/mmBtu specified in AP-42, Section 1.4, Table 1.4-2, dated 7/1998.

If required, particulate emissions shall be demonstrated according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

e. Emission Limitation:

There shall be no visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

g) Miscellaneous Requirements

(1) None.

11. P002, Catalyst Regen System

Operations, Property and/or Equipment Description:

Catalyst Regen System with FT Regen Vent

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Carbon monoxide (CO) emissions shall not exceed 180 pounds per regeneration cycle. See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves

the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

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

c. Per the permit application, catalyst regeneration produces only CO emissions during the oxidation phase of the process. The facility will conduct a maximum of 18 regeneration cycles per year resulting in a maximum of 1.8 tons of CO per year.

c) Operational Restrictions

(1) The maximum catalyst regeneration cycles shall not exceed eighteen (18) cycles per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the date and time of each catalyst regeneration cycle

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in the annual PER of the following:

a. each catalyst regeneration event that exceeds the maximum of eighteen (18) cycles per rolling, 12-month period.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

CO emissions shall not exceed 180 pounds per regeneration cycle.

Applicable Compliance Method:

If required, CO emissions shall be determined according to test Methods 1 - 4 and 10 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northeast District Office.

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group - Diesel Storage Tanks (1,500,000 gallons)

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T001	Diesel fixed roof storage tank (1,500,000 gallons)
T002	Diesel fixed roof storage tank (1,500,000 gallons)
T003	Diesel fixed roof storage tank (1,500,000 gallons)
T004	Diesel fixed roof storage tank (1,500,000 gallons)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.8 ton per rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)	Exempt. See b)(2)c.
d.	40 CFR Part 60, Subpart Kb	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

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

c. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

d. 40 CFR Part 60, Subpart Kb does not apply to storage vessels with a capacity greater than 151 cubic meters (39,890 gallons) storing a liquid with a true maximum vapor pressure less than 3.5 kilopascals (0.508 psia), per Section 60.110b(b).

c) Operational Restrictions

(1) The permittee shall not store a petroleum liquid with a true vapor pressure equal to or greater than 3.5 kilopascals (0.508 psia).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank;

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; and

c. the number of tank turnovers per year.

(2) These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the Ohio EPA Northeast District Office) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

VOC emissions shall not exceed 0.8 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated using: 'Tanks 4.0.9d', the latest version of Tanks computer software, or equivalent AP-42, Section 7.1, "Organic liquid Storage tanks' methodology issued by U.S. EPA for calculating tank emissions.

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group - Naphtha Storage Tanks (378,000 gallons)

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T005	378,000 Gallon Internal Floating Roof Naphtha Storage Tank
T006	378,000 Gallon Internal Floating Roof Naphtha Storage Tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The requirements of this rule are equivalent to the requirements established pursuant to 40 CFR Part 60, Subpart Kb. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-21-09(L)(1)	The requirements of this paragraph are equivalent to those specified in 40 CFR Part 60, Subpart Kb.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b-117b)	In accordance with 40 CFR 60.112b(a)(1) this emissions unit is a storage vessel, for which construction commenced after July 23, 1984, with a capacity greater than 151 m^3, containing a volatile organic liquid (VOL) that, as stored, has a maximum true

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		vapor pressure greater than or equal to 5.2 kPa but less than 76.6 kPa. See b)(2)c, c)(1), d)(1) and e)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

c. The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or

liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

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

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

c) Operational Restrictions

(1) These emissions units shall only be used to store petroleum liquids with a maximum true vapor pressure less than 76.6 kPa.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart Kb, including the following sections:

a. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Director (the appropriate Ohio EPA District Office or local air agency) in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):

i. the permittee shall visually inspect the vessel as specified in (a)(4) of 40 CFR 60.113b at least every 5 years; or

ii. thepermittee shall visually inspect the vessel as specified in (a)(2) of 40 CFR 60.113b.

d. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary

so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of 40 CFR 60.113b and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of 40 CFR 60.113b.

e. The permittee shall keep a record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

f. The permittee shall keep copies of all records required by this section, except for the record required by §60.116b(b), for at least 2 years. The record required by §60.116b(b) will be kept for the life of the source.

g. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

h. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

i. The permittee may use available data on the storage temperature to determine the maximum true vapor pressure as specified below:

   i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

   ii. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:

      (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Director (the appropriate Ohio EPA District Office or local air agency) specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

(b) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart Kb, including the following sections:

a. The permittee shall submit written notification at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (4) to the Director (the appropriate Ohio EPA District Office or local air agency) to provide the opportunity to have an observer present. If the inspection is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the appropriate Ohio EPA District Office or local air agency at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the appropriate Ohio EPA District Office or local air agency at least 7 days prior to the refilling.

b. After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall furnish the Director (the appropriate Ohio EPA District Office or local air agency) with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).

c. If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

d. After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Control measures and work practices necessary to reduce VOC emissions from this emissions unit.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

14. Emissions Unit Group – Lube Oil Storage Tanks

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T007	Lube oil fixed roof storage tank (378,000 gallons)
T008	Lube oil fixed roof storage tank (378,000 gallons)
T009	Lube oil fixed roof storage tank (273,000 gallons)
T010	Lube oil fixed roof storage tank (273,000 gallons)
T011	Lube oil fixed roof storage tank (113,400 gallons)
T012	Lube oil fixed roof storage tank (113,400 gallons)
T013	Lube oil fixed roof storage tank (113,400 gallons)
T014	Lube oil fixed roof storage tank (113,400 gallons)
T015	Lube oil fixed roof storage tank (113,400 gallons)
T016	Lube oil fixed roof storage tank (113,400 gallons)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.8 ton per rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(L)	Exempt. See b)(2)c.
d.	40 CFR Part 60, Subpart Kb	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

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

c. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

d. 40 CFR Part 60, Subpart Kb does not apply to storage vessels with a capacity greater than 151 cubic meters (39,890 gallons) storing a liquid with a true maximum vapor pressure less than 3.5 kilopascals (0.508 psia), per Section 60.110b(b).

c) Operational Restrictions

(1) The permittee shall not store a petroleum liquid with a true vapor pressure equal to or greater than 3.5 kilopascals (0.508 psia).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank;

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; and

c. the number of tank turnovers per year.

(2) These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the Ohio EPA Northeast District Office) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

VOC emissions shall not exceed 0.8 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated using: 'Tanks 4.0.9d', the latest version of Tanks computer software, or equivalent AP-42, Section 7.1, "Organic liquid Storage tanks' methodology issued by U.S. EPA for calculating tank emissions.

g) Miscellaneous Requirements

(1) None.