



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

06/25/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

**J001 (Loading Rack) a bulk petroleum terminal gasoline
tank truck loading rack**

BP Exploration & Oil Inc - Dayton Terminal (08-57-04-0266)

LeAnne Kunce
4800 E 49th St CC-II 112D
Cleveland, OH 44125

Dear LeAnne Kunce:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully. The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/25/03

Expiration Date: 06/25/08

This document constitutes issuance to:

Facility ID: 08-57-04-0266
BP Exploration & Oil Inc - Dayton Terminal
621 Brandt Pike
Dayton, OH 45404-0000

of a permit to operate for:

J001 (Loading Rack)
a bulk petroleum terminal gasoline tank truck loading rack

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Loading rack with carbon adsorption/gasoline absorption vapor recovery unit	OAC rule 3745-31-05 PTI # 08-3147	Gasoline loading: 0.50 pound of VOC per 1,000 gallons (60 mg/l) of gasoline loaded into the delivery vessels; 51.60 tons VOC per year Distillates loading (diesel fuels, fuel oils, and kerosene): 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessels; 2.38 tons VOC per year
	OAC rule 3745-21-09(Q) including but not limited to 3745-21-09(Q)(1)(b)(ii)	The limit (80 mg/l) specified by this rule is less stringent than the limit (60 mg/l) established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-35-07	The total annual VOC emissions from this facility shall not exceed 95 tons based upon a rolling 12-month summation.
		The total annual emissions of combined HAPs from this facility shall not exceed 25 tons per year based upon a rolling 12-month summation. (See A.2.a.)
		The total annual emissions of each individual HAP from this facility shall not exceed 10 tons per year based upon a rolling 12-month summation. (See A.2.a.)

2. Additional Terms and Conditions

- 2.a The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for each individual HAP and 25 TPY for the combination of all the HAPs.

B. Operational Restrictions

1. The annual throughputs of gasoline and distillates shall not exceed 204,000,000 gallons and 250,000,000 gallons, respectively. In order to ensure federal enforceability during the first twelve calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations:

Maximum Allowable Cumulative Throughputs For:

Month(s)	Gasoline (gallons)	Distillates (gallons)
1	17,000,000	20,833,333
1-2	34,000,000	41,666,666
1-3	51,000,000	62,499,999
1-4	68,000,000	82,333,332
1-5	85,000,000	104,166,665
1-6	102,000,000	124,999,998
1-7	119,000,000	145,833,331
1-8	136,000,000	166,666,664
1-9	153,000,000	187,499,997
1-10	170,000,000	208,333,330
1-11	187,000,000	229,166,663
1-12	204,000,000	250,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual gasoline and distillates throughput limitations shall be based upon rolling 12-month summations of the gasoline and distillates throughputs.

2. The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:
 - a. All vapors displaced from the gasoline delivery vessel during loading are vented only to the vapor collection system.
 - b. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
3. The loading rack shall be equipped with a vapor control system whereby:
 - a. All vapors collected by the vapor collection system are vented to the vapor control system.
 - b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
4. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
5. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
6. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
7. The permittee shall repair within fifteen days any leak from the vapor collection system and vapor control system which are employed to meet the requirements of paragraph (Q)(1) of rule 3745-21-09 when such leak is equal to or greater than one hundred percent of the lower explosive limit as propane, as determined under paragraph (K) of Rule 3745-21-10 of the Administrative Code.
8. The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 3% (as propane) is indicative of a possible violation of the allowable mass emission limitation (60 mg/l), and serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.]

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The total throughputs, in gallons, of gasoline and of distillates.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs, in gallons, of gasoline and distillates.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the total gasoline and distillates throughputs, in gallons.
2. The permittee shall perform monthly monitoring of the exhaust gas VOC concentrations for both carbon adsorption vessels in the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The VOC concentrations shall be measured during the processing of vapors and during the last five minutes of the adsorption cycle for each vessel; and the highest VOC concentration shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.

D. Reporting Requirements

1. The permittee shall submit semiannual deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month limitations on the throughputs of gasoline and distillates; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative throughput limits.

These semiannual written reports shall include the following:

- a. an identification of each deviation;
 - b. the probable cause of each deviation; and
 - c. any corrective actions or preventive measures which have been taken or will be taken.
- If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report which states that no deviations occurred during that 6-month period. The reports shall be submitted semiannually, i.e., by January 31 and July 31 of each year and shall address the data obtained during the previous 6-month periods (i.e., July to December and January to June, respectively).
2. This permittee shall submit annual reports of the total throughputs, in gallons, for gasoline and distillates during the calendar year, as well as the estimated total VOC emissions from this emissions unit, and the estimated total VOC emissions, individual HAP emissions, and combined HAPs emissions for the entire facility. Each annual report shall be submitted by January 31 of each year, and shall include the calculations of the VOC, individual HAP, and combined HAPs emissions.
 3. The permittee shall submit semiannual reports that identify all exceedances of the VOC concentration limit, along with the cause of the exceedances and an explanation of any corrective actions taken to prevent similar exceedances in the future. These semiannual reports shall be submitted by January 31 and July 31 of each year and shall address the data obtained during the previous six calendar months (i.e., July through December, and January through June, respectively).

E. Testing Requirements

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

The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test, during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum gasoline throughput possible.)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s).

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

- 2.a Emission Limitation -
.50 pound of VOC/1000 gallons of gasoline loaded

Applicable Compliance Method -
If required, the permittee shall demonstrate compliance in accordance with the methods and procedures specified in OAC rule 3745-21-10(E).

- 2.b Emission Limitation -
51.60 tons VOC/year from gasoline loading

Applicable Compliance Method -
See E.2.d.

- 2.c Emission Limitation -
.019 pound VOC/1000 gallons of distillates loaded
2.38 tons VOC/year from distillates loading

Applicable Compliance Method -
See E.2.d.

E. Testing Requirements (continued)

- 2.d** Emission Limitation-
less than 95 TPY VOC facility wide, based upon a rolling 12-month summation

Applicable Compliance Method-

In order to calculate the VOC emission rates, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 4.0."
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- iii. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
- iv. VOC emissions from the air stripper shall be based upon the record keeping and influent groundwater sampling required by the permit for emissions unit P002.
- v. VOC emissions from distillates loading shall be determined using AP-42, Fifth Edition, Equation 5.2-1.

- 2.e** Emission Limitation-
10 TPY for each individual HAP and 25 TPY for the combination of all the HAPs, based upon a rolling 12-month summations

Applicable Compliance Method-

For the individual HAPs, multiply the following emission factors, provided by the facility, by the actual annual VOC emission rate for the year (in TPY) for all emissions units at the facility:

hexane - 0.037 pound of hexane emissions per pound of VOC;
benzene - 0.0037 pound of benzene emissions per pound of VOC;
toluene - 0.072 pound of toluene emissions per pound of VOC;
2,2,4 trimethylpentane - 0.0073 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
xylene - 0.0023 pound of xylene emissions per pound of VOC; and
ethyl benzene - 0.0002 pound of ethyl benzene emissions per pound of VOC.

For the combined HAPs, sum the calculated annual emission rates for the individual HAPs.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following sections of this permit are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

06/25/03

RE: Final Chapter 3745-35 Permit To Operate

P002 (Air Stripper)
a groundwater extraction air stripper, 500 gal/min

BP Exploration & Oil Inc - Dayton Terminal (08-57-04-0266)
LeAnne Kunce
4800 E 49th St CC-II 112D
Cleveland, OH 44125

Dear LeAnne Kunce:

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date:

06/25/03

Expiration Date: 06/25/08

This document constitutes issuance to:

Facility ID: 08-57-04-0266
BP Exploration & Oil Inc - Dayton Terminal
621 Brandt Pike
Dayton, OH 45404-0000

of a permit to operate for:

P002 (Air Stripper)
a groundwater extraction air stripper, 500 gal/min

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Air stripper associated with groundwater remediation	OAC rule 3745-31-05 PTI # 08-2029	2.1 lbs/hr, 40 lbs/day, and 7.3 TPY of organic compounds (includes emissions of benzene, toluene, ethylbenzene, and xylene compounds)
	OAC rule 3745-35-07	The total annual VOC emissions from this facility shall not exceed 95 tons, based upon a rolling 12-month summation.
		The total annual emissions of combined HAPs from this facility shall not exceed 25 tons per year, based upon a rolling 12-month summation. (See A.2.a.)
	OAC rule 3745-21-07(G)(2)	The total annual emissions of each individual HAP from this facility shall not exceed 10 tons per year, based upon a rolling 12-month summation. (See A.2.a.) The hourly organic compound emission limitation in this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05. The daily organic compound emission limitation in this rule is equivalent to the daily emission limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for each individual HAP and 25 TPY for the combination of all the HAPs.

B. Operational Restrictions

1. The total organic compound concentration, including benzene, toluene, ethylbenzene, and xylene (BTEX), in the influent groundwater stream to this emissions unit shall not exceed 8400 parts per billion (ppb).
2. The daily throughput of groundwater through this emissions unit shall not exceed 720,000 gallons per day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall take monthly samples of the influent groundwater stream and conduct, or have conducted, an analysis for BTEX compounds. The analysis shall be conducted in accordance with U.S. EPA modified RM 602.
2. The permittee shall maintain daily records of the following information:
 - a. the daily throughput of groundwater through this emissions unit;
 - b. the results of the sampling/analyses required above; and
 - c. the calculation of the hourly and daily emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 2.1 pounds per hour, the actual hourly organic compound emissions for each such day, and the corrective actions that were taken to achieve compliance;
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, the actual daily organic compound emissions for each such day, and the corrective actions that were taken to achieve compliance;
 - c. an identification of each month during which the BTEX concentration did not comply with the permit limitation of 8400 ppb; and
 - d. an identification of each day during which the throughput of groundwater exceeded 720,000 gallons per day.
2. This permittee shall submit annual reports of the total VOC emissions from this emissions unit and the estimated total VOC emissions, individual HAP emissions, and combined HAPs emissions for the entire facility. Each annual report shall be submitted by January 31 of each year, and shall include the calculations of the VOC, individual HAP, and combined HAPs emissions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation-
2.1 lbs/hr of organic compounds

Applicable Compliance Method-
Actual hourly emissions shall be determined by multiplying the actual hourly throughput times the measured BTEX concentration (ppb), and times the groundwater density of 8.34 lbs/gal.
 - 1.b Emission Limitation-
40 lbs/day of organic compounds

Applicable Compliance Method-
Actual daily emissions shall be determined by multiplying the actual groundwater throughput per day times the measured BTEX concentration (ppb), and times the groundwater density of 8.34 lbs/gal.

E. Testing Requirements (continued)

- 1.c Emission Limitation -
7.3 tons/year of organic compounds

Applicable Compliance Method -

Actual annual emissions shall be determined by multiplying the actual groundwater throughput during the year times the annual average of the measured BTEX concentrations (ppb), and times the groundwater density of 8.34 lbs/gal.

- 1.d Emission Limitation-
less than 95 TPY VOC facility wide, based upon a rolling 12-month summation

Applicable Compliance Method-

In order to calculate the VOC emission rates, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 4.0."
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- iii. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
- iv. VOC emissions from the air stripper shall be based upon the record keeping and influent groundwater sampling required by this permit.
- v. VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Equation 5.2-1.

- 1.e Emission Limitation-
10 TPY for each individual HAP and 25 TPY for the combination of all the HAPs, based upon rolling 12-month summations

Applicable Compliance Method-

For the individual HAPs, multiply the following emission factors, provided by the facility, by the actual annual VOC emission rate for the year (in TPY) for all emissions units at the facility:

hexane - 0.037 pound of hexane emissions per pound of VOC;
benzene - 0.0037 pound of benzene emissions per pound of VOC;
toluene - 0.0072 pound of toluene emissions per pound of VOC;
2,2,4 trimethylpentane - 0.0073 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
xylene - 0.0023 pound of xylene emissions per pound of VOC; and
ethyl benzene - 0.0002 pound of ethyl benzene emissions per pound of VOC.

For the combined HAPs, sum the calculated annual emission rates for the individual HAPs.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following sections of this permit are federally enforceable: A - F.