

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

4/28/2014

Certified Mail

Alyssa Laird
Sunoco Partners Marketing & Terminals LP
1734 Old Route 66
Delmont, PA 15626

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

Facility ID: 0250000432
Permit Number: P0107044
Permit Type: Renewal
County: Mahoning

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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, Youngstown-Vindicator. 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, Manager
Permit Issuance and Data Management Section, DAPC

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Sunoco Partners Marketing & Terminals LP is an existing bulk petroleum distribution terminal located in Youngstown, Ohio. The facility has a gasoline loading rack (J001) controlled with an enclosed ground flare. The facility has four permitted storage tanks. The facility is requesting federally enforceable restrictions to avoid Title V. The facility is requesting a throughput limitation of 200,000,000 gallons of gasoline, 180,000,000 gallons of distillates, and 1,000,000 gallons of additives in a rolling 12-month summation to avoid the major permitting thresholds.

The area source MACT, or GACT, Subpart BBBB applies to this facility, however, Ohio EPA has not accepted delegation authority for it at this time.

3. Facility Emissions and Attainment Status:

Sunoco is a synthetic minor source for VOC emissions. Mahoning County is currently in attainment for all criteria pollutants.

4. Source Emissions:

(All emissions in tons/yr)

Facility Name	Source Description	Emission Pt.	VOC (tons/yr)	Primary Storage	Benzene (71-43-2)	Cumene (98828)	MTBE (1634-04-4)	Napthalene (91-20-3)	Toluene (108-88-3)	Xylene (1330-20-7)	Ethylbenzene (100-41-4)	Isocatane (540841)	n-Hexane (110-54-3)	Total HAP	
Youngstown	Gasoline Truck Loading	J001	74.11		0.76	0.01	0.00	0.39	1.23	0.43	0.07	0.00	1.25	4.13	
	Distillate Truck Loading	J001	1.34		0.00	0.00	0.00	0.01	0.03	0.08	0.00	0.00	0.00	0.12	
	Fugitives	Z001	0.78		0.02	0.02	0.00	0.02	0.16	0.15	0.03	0.04	0.02	0.46	
	transmix loading	TMP165992	1.50		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	
	Tank #1	T002	0.06	Diesel	0.00				0.00	0.00	0.00			0.00	
	Tank #2	T003	0.06	Diesel	0.00				0.00	0.00	0.00			0.00	
	Tank #4	Z002	0.29	Additive						0.04	0.01			0.05	
	Tank #11	T004	1.78	Gasoline	0.00	0.00		0.00	0.02	0.01	0.00	0.02	0.02	0.07	
	Tank #12	T001	1.96	Gasoline	0.00	0.00		0.00	0.03	0.02	0.00	0.02	0.02	0.09	
	Tank #13	T005	1.00	Ethanol											
	Tank #14	TMP165969	2.15	Transmix	0.01	0.00		0.00	0.01	0.00	0.00			0.02	
	Oil/ Water Separator	Z003	0.02		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Terminal PTE			85.04		0.79	0.03	0.00	0.41	1.49	0.73	0.12	0.08	1.31	4.96

This facility is accepting an emissions limit of 100 tons per year of VOC, verified by the proposed throughput limits outlined below. Other assumptions used to verify the proposed limitations include, uncontrolled transmix & distillates loading and the 80mg/L emission limit of the

5. Conclusion:

Issue the permit.

6. Please provide additional notes or comments as necessary:

None



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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.9
Individual HAP	9.9
Combined HAP	24.9

PUBLIC NOTICE
4/28/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Sunoco Partners Marketing & Terminals LP
6331 Southern Boulevard,
Youngstown, OH 44512

Mahoning County

FACILITY DESC.: Petroleum Bulk Stations and Terminals

PERMIT #: P0107044

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO Renewal for a gasoline loading rack and associated storage tanks

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: Jana Gannon, 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
Sunoco Partners Marketing & Terminals LP

Facility ID:	0250000432
Permit Number:	P0107044
Permit Type:	Renewal
Issued:	4/28/2014
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
Sunoco Partners Marketing & Terminals LP

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	12
1. J001, Truck Loading.....	13
2. Emissions Unit Group - Storage Tanks: T001, T002, T003, T004	21



Draft Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP
Permit Number: P0107044
Facility ID: 0250000432

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0250000432
Application Number(s): A0040504, A0040533
Permit Number: P0107044
Permit Description: FEPTIO Renewal for a gasoline loading rack and associated storage tanks
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/28/2014
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:

Sunoco Partners Marketing & Terminals LP
6331 Southern Boulevard
Youngstown, OH 44512

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: P0107044

Permit Description: FEPTIO Renewal for a gasoline loading rack and associated storage tanks

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

Emissions Unit ID:	J001
Company Equipment ID:	Truck Loading
Superseded Permit Number:	P0085574
General Permit Category and Type:	Not Applicable

Group Name: Storage Tanks

Emissions Unit ID:	T001
Company Equipment ID:	Tank #12
Superseded Permit Number:	P0085574
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Tank #1
Superseded Permit Number:	P0085574
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Tank #2
Superseded Permit Number:	P0085574
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Tank #11
Superseded Permit Number:	P0085574
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP
Permit Number: P0107044
Facility ID: 0250000432
Effective Date: To be entered upon final issuance

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 being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP
Permit Number: P0107044
Facility ID: 0250000432
Effective Date: To be entered upon final issuance

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) B.2, B.3, B.4, B.5, B.6, B.7 and B.8
2. The emissions of volatile organic compounds (VOC) from J001, T001, T002, T003, T004, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99.9 tons per rolling, 12-month period.
3. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from J001, T001, T002, T003, T004, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for total combined HAPs, based upon rolling, 12-month summations of the HAP emissions.
4. The permittee shall, on an annual basis, maintain the following information for the entire facility:
 - a) the total VOC emissions, in tons per month;
 - b) the individual HAP emissions, in tons per month;
 - c) the total combined HAP emissions, in tons per month;
 - d) the rolling, 12-month summation of total VOC emissions, in tons;
 - e) the rolling, 12-month summation of individual HAP emissions, in tons; and
 - f) the rolling, 12-month summation of total combined HAP emissions, in tons.
5. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) all exceedances of the rolling, 12-month VOC emission limitation;



- (2) all exceedances of the rolling, 12-month individual HAP emission limitation; and
- (3) all exceedances of the rolling, 12-month total combined HAP emission limitation;
- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, Northeast District Office).

6. The permittee shall submit annual reports that identify the following:

- a) the total actual emissions of each individual HAP;
- b) the total actual emissions of total combined HAPs; and
- c) the total actual emissions of all VOC emissions.

7. Emission Limitations:

The emissions of VOC from J001, T001, T002, T003, T004, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined as follows:

- a. VOC emissions from gasoline and distillate loading shall be determined in accordance with the monitoring and record keeping requirements in Section C - Emissions Unit Terms and Conditions for J001.
- b. VOC emissions from the storage tanks shall be determined using the most recent version of the U.S. EPA's TANKS program.

8. Emission Limitations:

The emissions of HAP, as identified in Section 112(b) of Title III of the Clean Air Act, from J001, T001, T002, T003, T004, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-



03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for total combined HAPs, based upon rolling, 12-month summations of the HAP emissions.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined as follows:

- a) For individual and total combined HAP emissions from gasoline loading, multiply the VOC emissions by the following HAP emission factors derived from using the speciation option of the U.S. EPA's TANKS program:

benzene – 0.00404 pound of benzene emissions per pound of VOC emissions;
ethylbenzene - 0.000517 pound of ethylbenzene emissions per pound of VOC emissions;
hexane - 0.00360 pound of hexane emissions per pound of VOC emissions;
toluene - 0.00530 pound of toluene emissions per pound of VOC emissions;
xylene - 0.00237 pound of xylene emissions per pound of VOC emissions;
2,2,4-trimethylpentane - 0.00458 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions; and
isopropylbenzene – 0.000133 pound of isopropylbenzene emissions per pound of VOC emissions.

- b) For individual and total combined HAP emissions from distillate loading, multiply the VOC emissions by the following HAP emission factors derived from using the speciation option of the U.S. EPA's TANKS program:

benzene - 0.00206 pound of benzene emissions per pound of VOC emissions;
ethylbenzene - 0.00296 pound of ethylbenzene emissions per pound of VOC emissions;
hexane - 0.000424 pound of hexane emissions per pound of VOC emissions;
toluene - 0.0228 pound of toluene emissions per pound of VOC emissions; and
xylene - 0.0549 pound of xylene emissions per pound of VOC emissions.

- c) For individual and total combined HAP emissions from the storage tanks, use the speciation option of the most recent version of the U.S. EPA's TANKS program.

9. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, 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 this rule are in effect and shall be enforced 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>.



Draft Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP
Permit Number: P0107044
Facility ID: 0250000432
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Truck Loading

Operations, Property and/or Equipment Description:

Gasoline truck loading rack controlled by an enclosed ground 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. b)(1)b, b)(2)a, b)(2)b, b)(2)c, d)(6), e)(3), f)(2)a, f)(2)b and f)(2)c

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 3745-21-09(Q)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D). See c)(1) through c)(6).
b.	OAC rule 3745-31-05(D) (federally enforceable limitations to avoid Title V and MACT)	Limitation applicable to the loading of gasoline (i.e., gasoline, ethanol, and gasoline additives): 0.67 pound of VOC per 1,000 gallons of gasoline loaded into the gasoline delivery vessel. Limitation applicable to the loading of distillates (i.e., diesel, kerosene, and diesel additives):



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.016 pound of VOC per 1,000 gallons of distillates loaded into the distillates delivery vessel.</p> <p>The total VOC emissions from loading gasoline, ethanol, and distillates shall not exceed 75.94 tons per rolling, 12-month period, including 74.5 tons from gasoline loading (including additives) and 1.44 tons from distillates loading.</p> <p>See b)(2)a through b)(2)c.</p> <p>See B.2 through B.8 of Section B - Facility-Wide Terms and Conditions.</p>

(2) Additional Terms and Conditions

- a. The annual throughput of gasoline (i.e., gasoline and ethanol) shall not exceed 200,000,000 gallons per rolling, 12-month period.
- b. The annual throughput of distillates (i.e., diesel and kerosene) shall not exceed 180,000,000 gallons per rolling, 12-month period.
- c. The annual throughput of additives (i.e., gasoline additives and diesel additives) shall not exceed 1,000,000 gallons per rolling, 12-month period.

c) Operational Restrictions

- (1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- (2) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system; and
 - b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.



- (3) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
 - (4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
 - (6) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
 - (7) The pilot flame in the flare's pilot light burner shall be maintained at all times during the loading of gasoline (i.e., gasoline, ethanol, and gasoline additives) and distillates (i.e., diesel and diesel additives).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall implement a preventive maintenance program (PMP) for the John Zink enclosed ground flare which has been approved by the Ohio EPA, Northeast District Office. The PMP shall include an annual inspection of the flare by a qualified individual. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the Ohio EPA, Northeast District Office.
 - (2) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
 - (3) The permittee shall perform monthly monitoring of all potential sources of vapor leaks in the terminal's vapor collection system and vapor control system while a gasoline tank truck is being loaded. The monthly monitoring shall be conducted approximately every 30 days. The permittee shall record VOC concentration which is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 as vapor leaks. The permittee shall maintain records of the results of the monthly leak checks, including at a minimum, the following information:
 - a. the date of inspection;
 - b. the findings of the inspection, which shall indicate the location, nature, and severity of the leak;
 - c. the leak detection method;



- 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) for each leak equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and
 - f. the inspector's name and signature.
- (4) The permittee shall properly install, operate, and maintain a heat-sensing device (e.g. ultraviolet or thermocouple) to indicate the presence of a flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. Each business day, the operator shall verify that the pilot flame and flame sensor are working during loading operations.
- (5) The permittee shall collect and record the following information each day:
- a. the results of the daily pilot inspections;
 - b. descriptions of any failures of the flame detection system;
 - c. if a failure is detected, record the period of time when gasoline was loaded, until the system is repaired; and
 - d. a log or record of operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- (6) The permittee shall maintain monthly records of the following information:
- a. the total throughput of gasoline (i.e., gasoline and ethanol), in gallons;
 - b. the total throughput of distillates (i.e., diesel and kerosene), in gallons;
 - c. the total throughput of additives (i.e., gasoline additives and diesel additives), in gallons;
 - d. the VOC emissions from emissions unit J001, in tons;
 - e. the rolling, 12-month summation of all loading rack gasoline throughput, in gallons;
 - f. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - g. the rolling, 12-month summation of all loading rack additive throughput, in gallons; and
 - h. the rolling, 12-month summation of VOC emissions from emissions unit J001, in tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods during which the flare's pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period and an explanation of any corrective action taken to prevent similar occurrences.
- (2) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the Ohio EPA, Northeast District Office) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month gasoline throughput limitation;
 - ii. all exceedances of the rolling, 12-month distillate throughput limitation;
 - iii. all exceedances of the rolling, 12-month additive throughput limitation; and
 - iv. all exceedances of the rolling, 12-month VOC emission limitation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA, Northeast District Office).

- (4) The permittee shall submit annual reports that identify the following:
 - a. the total actual emissions of VOC from this emissions unit; and
 - b. the total annual throughputs of gasoline, distillates and additive.



These annual reports shall be submitted by April 15 of each year, and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
 - (6) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months after permit issuance, and within 12 months prior to the permit expiration, during the summer months when the gasoline vapor pressure is highest.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC mass emission limitation of 0.67 pound of VOC per 1,000 gallons of gasoline loaded in accordance with the procedures specified in OAC rule 3475-21-10(E).

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).
 - e. Personnel from the Ohio EPA, Northeast District Office 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.



- f. 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 Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.
- (2) 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:
0.67 pound of VOC per 1,000 gallons of gasoline loaded
Applicable Compliance Method:
Compliance with this emission limitation shall be demonstrated through the emission testing required in f)(1) above.
- b. Emission Limitation:
0.016 pound of VOC per 1,000 gallons (0.17 mg/l) of distillates loaded
Applicable Compliance Method:
The allowable mass emission rate for distillate loading was established using Equation 1 specified in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 5.2 (6/08).
- c. Emission Limitation:
The total VOC emissions from loading gasoline, ethanol, and distillates shall not exceed 75.94 tons per rolling, 12-month period, including 74.5 tons from gasoline loading (including additives) and 1.44 tons from distillates loading.
Applicable Compliance Method:
Compliance shall be determined based upon a summation of the following:
- i. For emissions from the control device, sum the monthly gasoline throughputs for the 12-month period and multiply this sum by the results of the most recent emissions test for the control device (in lbs/1000 gallons gasoline loaded) and divide by 2,000 lbs/ton.
- ii. For fugitive VOC emissions from gasoline truck loading, sum the monthly gasoline throughputs for the 12-month period and divide this sum by 2,000 lbs/ton and multiply by a vapor-tightness loss rate of 0.075 lb/1000 gal (9 mg/L) from the trucks. The 0.075 lb/1000 gal leakage emission factor is calculated using 0.5% as the average leakage from a truck



Draft Permit-to-Install and Operate

Sunoco Partners Marketing & Terminals LP

Permit Number: P0107044

Facility ID: 0250000432

Effective Date: To be entered upon final issuance

passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- iii. For fugitive VOC emissions from distillate truck loading, sum the monthly distillate throughputs for the 12-month period and divide this sum by 2,000 lbs/ton and multiply by an emission factor of 0.016 lb/1000 gal. The emission factor is taken from AP-42 "Compilation of Air Pollutant Emission Factors", Table 5.2-5 (1/95).
- iv. VOC fugitive emissions (e.g., valves, fittings, and pumps) from the loading rack shall be determined using the emission factors from Table 2-3 in EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates".

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - Storage Tanks: T001, T002, T003, T004

EU ID	Operations, Property and/or Equipment Description
T001	400,000 gallon above-ground internal floating roof gasoline storage tank (Tank #12)
T002	150,000 gallon above-ground internal floating roof gasoline storage tank (Tank #1)
T003	150,000 gallon above-ground internal floating roof gasoline storage tank (Tank #2)
T004	210,000 gallon above-ground internal floating roof gasoline storage tank (Tank #11)

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. b)(1)b and d)(3)

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 3745-21-09(L)	See c)(1).
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See B.2 through B.8 of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.



- b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
- d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

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; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid.

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.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain monthly records of the following information:
 - a. the identification of each material stored; and
 - b. the total throughput of each material stored, in gallons per month.

e) **Reporting Requirements**

- (1) The permittee shall notify the director (the Ohio EPA, Northeast District Office) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



Draft Permit-to-Install and Operate

Sunoco Partners Marketing & Terminals LP

Permit Number: P0107044

Facility ID: 0250000432

Effective Date: To be entered upon final issuance

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. None.

g) Miscellaneous Requirements

(1) None.