

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

5/1/2014

Certified Mail

Aricka Peters
BP PRODUCTS NORTH AMERICA INC CINCINNATI
930 TENNESSEE AVE
Cincinnati, OH 45229

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431070118
Permit Number: P0116569
Permit Type: Renewal
County: Hamilton

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

BP PRODUCTS NORTH AMERICA INC CINCINNATI

Facility ID:	1431070118
Permit Number:	P0116569
Permit Type:	Renewal
Issued:	5/1/2014
Effective:	5/1/2014
Expiration:	5/1/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
BP PRODUCTS NORTH AMERICA INC CINCINNATI

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Final Permit-to-Install and Operate
BP PRODUCTS NORTH AMERICA INC CINCINNATI
Permit Number: P0116569
Facility ID: 1431070118
Effective Date: 5/1/2014

Authorization

Facility ID: 1431070118
Application Number(s): A0050359
Permit Number: P0116569
Permit Description: FEPTIO renewal for nine storage tanks and a loading rack located at a petroleum liquid terminal.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/1/2014
Effective Date: 5/1/2014
Expiration Date: 5/1/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BP PRODUCTS NORTH AMERICA INC CINCINNATI
930 TENNESSEE AVE
Cincinnati, OH 45229

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

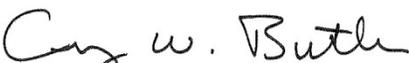
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0116569

Permit Description: FEPTIO renewal for nine storage tanks and a loading rack located at a petroleum liquid terminal.

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

Emissions Unit ID: J002
 Company Equipment ID: Loading Rack
 Superseded Permit Number: P0105209
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T006
 Company Equipment ID: Tank #1
 Superseded Permit Number: P0098109
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T016
 Company Equipment ID: Tank #24
 Superseded Permit Number: P0098117
 General Permit Category and Type: Not Applicable

Group Name: Group A

Emissions Unit ID:	T001
Company Equipment ID:	Tank #3
Superseded Permit Number:	P0098110
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Tank #12
Superseded Permit Number:	P0098111
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Tank #14
Superseded Permit Number:	P0098112
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Tank #23
Superseded Permit Number:	P0098113
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Tank #2
Superseded Permit Number:	P0098114
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	Tank #4
Superseded Permit Number:	P0098115
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	Tank #10
Superseded Permit Number:	P0098116
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
BP PRODUCTS NORTH AMERICA INC CINCINNATI
Permit Number: P0116569
Facility ID: 1431070118
Effective Date: 5/1/2014

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 [DO/LAA] 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.



Final Permit-to-Install and Operate
BP PRODUCTS NORTH AMERICA INC CINCINNATI
Permit Number: P0116569
Facility ID: 1431070118
Effective Date: 5/1/2014

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) 3., 4., 5. and 6.
2. The Ohio EPA has determined that this facility may be applicable 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>.
3. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units F001(Roadways and parking areas), G001(Underground storage tank and fueling island for company use), J002 (Refined petroleum products truck loading rack), T001(Tank #3), T002 (Tank #12), T003 (Tank #14), T004 (Tank #23), T005 (Tank #2), T006 (Tank #1), T007 (Tank #4), T008 (Tank #6) T009 (Tank #7), T010 (Tank #8), T011 (Tank #22), T012 (Tank #20), T013(Tank #21), T014(Tank #10), T016(Tank #24), T017(Tank #19), T018(Tank #11), T022(Tank #15), T023(Tank#17), fugitive emissions from truck loading, fugitive emissions from equipment (valves, pumps, connectors), and including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of the permit.
4. The permittee shall collect and record the following information each month for emissions units F001(Roadways and parking areas), G001(Underground storage tank and fueling island for company use), J002 (Refined petroleum products truck loading rack), T001(Tank #3), T002 (Tank #12), T003 (Tank #14), T004 (Tank #23), T005 (Tank #2), T006 (Tank #1), T007 (Tank #4), T008 (Tank #6) T009 (Tank #7), T010 (Tank #8), T011 (Tank #22), T012 (Tank #20), T013(Tank #21), T014(Tank #10), T016(Tank #24), T017(Tank #19), T018(Tank #11), T022(Tank #15), T023(Tank#17), fugitive emissions from truck loading, fugitive emissions from equipment (valves, pumps, connectors), and including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources:



- a) the company identification for each HAP containing material employed;
- b) the amount of each HAP containing material employed, in pounds;
- c) the HAP¹ content, recorded in percent by weight, of each HAP containing material;
- d) the total individual HAP emissions for each HAP from all HAP containing materials employed, in pounds or tons per month [for each HAP, the product of 4.b) times 4.c)];
- e) the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months;
- f) the total combined HAP emissions from all HAP containing materials employed, in pounds per month; and
- g) the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis..

5. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations specified in 3. above. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted electronically by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

6. Compliance with the emission limitations in 3. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a) Emission Limitations:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 4. above.



Final Permit-to-Install and Operate
BP PRODUCTS NORTH AMERICA INC CINCINNATI
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Effective Date: 5/1/2014

C. Emissions Unit Terms and Conditions



1. J002, Loading Rack

Operations, Property and/or Equipment Description:

Refined petroleum products truck loading rack

- 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., d)(5), e)(2), f)(1)b. and f)(1)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 mass emission limitation specified by this rule is less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05(D)
b.	OAC 3745-31-05(D) (Voluntary restriction to avoid Title V)	<p>The mass emissions of VOC from the vapor control system shall not exceed 0.30 pound per 1000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.</p> <p>Emissions of VOC from the loading of gasoline shall not exceed 57 tons per year based on a rolling, 12-month summation.</p> <p>Emissions of VOC from the loading of non-gasoline distillate products (diesel fuels, fuel oils and kerosene) shall not exceed 0.25 ton per month and 3.0 tons</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		per year based on a rolling, 12-month summation. See section B.3., b)(2)a., d)(5), e)(2) and f)(1)b. and f)(1)c.

(2) Additional Terms and Conditions

- a. The annual throughputs of gasoline and distillates shall not exceed 380,000,000 gallons and 300,000,000 gallons, respectively. Compliance with the annual gasoline and distillates throughput limitations shall be based upon rolling 12-month summations of the gasoline and distillate throughputs.

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;
- b. the mass emissions of VOC from the vapor control system do not exceed 0.30 pound of VOC per 1,000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel; and
- c. 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.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) 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).
- (2) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (3) The maximum exhaust gas VOC concentration shall not exceed 1.75% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 1.75% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation (35 mg/l).]
- (4) The permittee shall perform monthly monitoring of the exhaust gas VOC concentrations from 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 for each vessel shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.
- (5) The permittee shall maintain monthly records of the following information:
 - a. the total throughputs, in gallons, of gasoline and distillates for each month; and
 - b. the rolling, 12-month summations of the total gasoline and distillates throughputs, in gallons.
 - c. the calculated rolling, 12-month rolling summation of VOC emissions in TPY.

e) **Reporting Requirements**

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District



Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) 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. the rolling, 12-month summations of the total gasoline and distillates throughputs, in gallons.
 - ii. The calculated rolling, 12-month rolling summation of VOC emissions in TPY.
 - 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 appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit
- (4) 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 appropriate Ohio EPA District Office or local air agency) 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.



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 Limitations:

The mass emissions of VOC from the vapor control system shall not exceed 0.30 pound per 1000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted within 2.5 years after the effective date of this permit. The test shall be conducted between the months of May through September during this period;
- ii. the emission testing shall be conducted to demonstrate compliance with the 0.30 pounds of VOC per thousand gallons, (35 milligrams of VOC per liter) of gasoline loaded;
- iii. the test shall be conducted as specified in OAC rule 3745-21-10(E), Method for the determination of VOC emissions from bulk gasoline terminals; and
- iv. 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 appropriate Ohio EPA District Office or local air agency. A minimum of one 6-hour test, during which at least 784,800 liters (207,400 gallons) of gasoline are loaded. (The test should be conducted at the maximum gasoline throughput possible.)

*For this emission unit the maximum capacity of the unit shall be defined as the 6-hour period in which the highest throughput normally occurs.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).



Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

b. Emission Limitation:

Emissions of VOC from the loading of non-gasoline distillate products (diesel fuels, fuel oils and kerosene) shall not exceed 0.25 ton per month and 3.0 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon emission factors from AP-42, 5th Edition, Table 5.2-5 (1/95) of 0.016 pound of VOC per 1,000 gallons of kerosene and 0.014 pound VOC per 1,000 gallons of diesel multiplied by the monthly distillate throughput in d)(5)a.

c. Emission Limitation:

Emissions of VOC from the loading of gasoline shall not exceed 57 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the record keeping in d)(5) above and a summation of the emissions from the carbon VRU , gasoline loading fugitive emissions, and distillate fuel loading emissions as follows:

- i. For the VCU, sum the monthly gasoline throughputs for the 12-month period and multiply this sum by the results of the most recent emission tests for the VCU (in lbs VOC/1,000 gallons gasoline loaded) and divide by 2,000 lbs/ton.
- ii. For gasoline loading fugitive emission, sum the monthly gasoline throughputs for the 12-month period and divide this sum by 2,000 lbs/ton and multiply by the emission factor (lbs VOC/1,000 gallons gasoline) obtained using Equation 1 from AP-42, Section 5.2 (1/95) multiplied by the overall reduction efficiency term of $(1 - \text{efficiency} / 100)$ (AP-42, Section 5.2 (1/95), page 5.2-6) using an efficiency of 98.7% (Gasoline Distribution Industry (Stage I) - Background Information from Promulgated Standards, EPA-450/R-94-002b, November 1994, Appendix A, page A-5).



- iii. For distillate fuel loading emissions, sum the distillate fuel throughputs for the 12-month period and divide this sum by 2,000 lbs/ton and multiply by the emission factor 0.016 lb VOC/1,000 gallons fuel obtained from AP-42, Table 5.2-5 (1/95).
- iv. VOC fugitive emission (e.g., valves, fittings, and pumps) from the loading rack shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

g) Miscellaneous Requirements

- (1) None.



2. T006, Tank #1

Operations, Property and/or Equipment Description:

802,000 gallon internal floating roof 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. b)(1)d.
- 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)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Ka.
b.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2), e)(1) through e)(3).
c.	40 CFR Part 60, Subpart Ka (§60.110a - §60.115a) [In accordance with 40 CFR 60.110a(a), this emissions unit is a storage vessel with a storage capacity greater than 40,000 gallons that is used to store petroleum liquids for which construction commenced after May 18, 1978 and prior to July 23, 1984.]	See c)(2) and d)(3).
d.	OAC rule 3745-31-05(D)	See section B.3.



- (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.
 - (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Ka, including the following section:
§60.112a(a)(2) design and operating requirements
- 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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 comply with the applicable restrictions required under 40 CFR Part 60, Subpart Ka, including the following sections:
§60.115a(a) & (b) stored liquid and vapor pressure records



e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Southwest Ohio Air Quality Agency 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.

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:

Control Measures

Control measures pursuant to OAC rule 3745-21-09(L) in c)(1) and control measures pursuant to 40 CFR Part 60, Subpart Ka in c)(2).

Applicable Compliance Method

If required, compliance with the control measures may be demonstrated by reviewing the permittee's records of the design of the tank including drawing and blueprints, records of any inspection(s) of the tank, and records of maintenance activities performed on the tank.

g) Miscellaneous Requirements

- (1) None.



3. T016, Tank #24

Operations, Property and/or Equipment Description:

90,340 Gallon Internal floating roof 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. b)(1)b.

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)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.67 TPY.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	See section B.3.
c.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2), e)(1) through e)(3).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of an internal floating roof and submerged fill.



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:
 - a. The types of petroleum liquids stored in the tank.
 - b. The maximum true vapor pressure (in pounds per square in absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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.
 - (4) Prior to a change in the material stored (inorganic or organic) in this emissions unit, the permittee shall provide written notification to the Southwest Ohio Air Quality Agency. The permittee shall not store any material until they have been notified that compliance has been demonstrated and whether a permit modification is needed.
- 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. Emissions Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 0.67 TPY.

Applicable Compliance Method:

Compliance with the emissions limitation above shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in application A0050359.
- g) Miscellaneous Requirements
- (1) None.



4. Emissions Unit Group -Group A: T001,T002,T003,T004,T005,T007,T014,

EU ID	Operations, Property and/or Equipment Description
T001	321,300 gallon domed external floating roof storage tank; Tank #3
T002	504,000 gallon domed external floating roof storage tank for gasoline or distillate
T003	838,236 gallon internal floating roof storage tank
T004	677,880 gallon domed external floating roof storage tank
T005	336,000 gallon domed internal floating roof storage tank
T007	203,700 gallon domed internal floating roof storage tank
T014	487,200 domed external floating roof storage tank for gasoline and distillate

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) 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), d)(1), d)(2), e)(1) through e)(3) below.
b.	OAC rule 3745-31-05(D)	See section B.3.

(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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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.



- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve 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. None.

- g) Miscellaneous Requirements
 - (1) None.