



6/17/2014

Certified Mail

SHAUN KIZEWSKI
 ARC TERMINALS HOLDINGS LLC
 3000 RESEARCH FOREST DR
 STE 250
 THE WOODLANDS, TX 77386

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448010123
 Permit Number: P0116704
 Permit Type: Renewal
 County: Lucas

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 Toledo Department of Environmental Services at (419)936-3015 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: TDES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ARC TERMINALS HOLDINGS LLC**

| | |
|----------------|------------|
| Facility ID: | 0448010123 |
| Permit Number: | P0116704 |
| Permit Type: | Renewal |
| Issued: | 6/17/2014 |
| Effective: | 6/17/2014 |
| Expiration: | 6/17/2019 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
ARC TERMINALS HOLDINGS LLC

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Final Permit-to-Install and Operate
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

Authorization

Facility ID: 0448010123
Application Number(s): A0050344, A0050645
Permit Number: P0116704
Permit Description: FEPTIO Renewal for loading racks and storage tanks.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/17/2014
Effective Date: 6/17/2014
Expiration Date: 6/17/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ARC TERMINALS HOLDINGS LLC
2844 N SUMMIT ST
TOLEDO, OH 43611

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

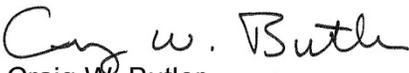
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0116704
 Permit Description: FEPTIO Renewal for loading racks and 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: | Loading Rack |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | J002 |
| Company Equipment ID: | Barge Loading |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | J003 |
| Company Equipment ID: | Railcar Loading |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T002 |
| Company Equipment ID: | Tank 40-2 |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T005 |
| Company Equipment ID: | Tank 15-5 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T009 |
| Company Equipment ID: | Tank S-13 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T010 |
| Company Equipment ID: | New 40,000 BBL Tank |
| Superseded Permit Number: | P0105746 |
| General Permit Category and Type: | Not Applicable |

Group Name: Tanks exempt fr Kb applicability

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | T001 |
| Company Equipment ID: | Tank 40-1 |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T003 |
| Company Equipment ID: | Tank 30-3 |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T004 |
| Company Equipment ID: | Tank 60-4 |
| Superseded Permit Number: | P0088095 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

| | |
|----------------------------------|----------------|
| Emissions Unit ID: | T008 |
| Company Equipment ID: | Tank 6-8 |
| Superseded Permit Number: | |
| General Permit Category andType: | Not Applicable |

Group Name: Tanks w/Kb applicability

| | |
|----------------------------------|----------------|
| Emissions Unit ID: | T006 |
| Company Equipment ID: | Tank 15-6 |
| Superseded Permit Number: | 04-01502 |
| General Permit Category andType: | Not Applicable |
| Emissions Unit ID: | T007 |
| Company Equipment ID: | Tank 15-7 |
| Superseded Permit Number: | 04-01502 |
| General Permit Category andType: | Not Applicable |



Final Permit-to-Install and Operate
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

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
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

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) B.4. through B.6.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Kb: T006, T007. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Toledo Division of Environmental Services.
3. The permittee is advised that this facility is subject to the “Generally Available Control Technology” (GACT) requirements under 40 CFR Part 63, Subpart BBBBBB, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipelines. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.
4. Hazardous air pollution (HAP) emissions from this facility have been determined to be less than 10 tons per year of any individual HAP and less than 25 tons per year for any combination of HAP. The synthetic minor source facility-wide PTE HAP determination was made by a one-time calculation following the procedure for MACT applicability given in 40 CFR Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations, Section 63.420 – Applicability). Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirement to ensure compliance with these emissions limitations.

The one-time calculation, where compliance is determined by a calculated value of ET of less than 1.0, is as follows:

$$ET = 0.161[0.59(TF)(1CE) + 0.17(TE) + 0.08(TES) + 0.038(TI) + 8.510^{-6}(C) + KQ] + 0.04(OE)$$

$$ET = 0.161 [0.59(1)(1-0) + 0.17(0) + 0.08(0) + 0.038(5) + 8.510^{-6}(1000) + KQ] + 0.04(.077)$$

$$ET = 0.161 [0.59 + 0 + 0 + 0.190 + 0.009 + (4.510^{-9})(EF + L)Q] + 0.003$$

$$(EF + L) = (0.33 \text{ lb}/1000 \text{ gal})(1000 \text{ gal}/3785.4 \text{ l})(454,000 \text{ mg}/\text{lb}) + (13)$$

$$(EF + L) = (40 + 13) = 53 \text{ mg of total organic compounds per liter of gasoline loaded}$$



$$Q = 322,368,000 \text{ gal/yr} (3.7854 \text{ l/gal})(1 \text{ yr}/365 \text{ d}) = 3.34 \times 10^6 \text{ l/d}$$

$$ET = 0.161 [0.789 + (4.510^{-9})[53](3.34 \times 10^6) + 0.003$$

$$ET = 0.161 [0.789 + 0.797] + 0.003$$

$$ET = 0.258$$

where:

ET = emissions screening factor for bulk gasoline terminals, this number will be less than 1.0 if the facility is a minor source for HAPs

CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater methyl tert-butyl ether (MTBE),

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels = 0;

TF = total number of fixed-roof gasoline storage vessels without an internal floating roof = 1 (Surge Tank S-13);

TE = total number of external floating roof gasoline storage vessels with only primary seals = 0;

TES = total number of external floating roof gasoline storage vessels with primary and secondary seals = 0;

TI = total number of fixed-roof gasoline storage vessels with an internal floating roof; There are five permitted IFR gasoline storage tanks = 5 (T001, T003, T004, T006 and T007).

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service = 1000 (897 was existing number in 1996 submittal);

Q = gasoline throughput limitation on potential to emit (liters/day) = 3.34×10^6 l/d;

K = $(4.510^{-9})(EF + L)$ for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions = 40 mg of total organic compounds per liter of gasoline loaded;

OE = other HAP emissions screening factor for bulk gasoline terminals (tons per year) = 0.077 tpy from miscellaneous sources including the loadout of distillate per a 10/22/96 Clark Oil PTE analysis. OE equals the total HAP from other emission sources not specified in parameters in the equations for ET. If the value of $0.04(OE)$ is greater than 5 percent of either ET, then this calculation shall not be used to determine major HAP status (4% of OE = 0.003, 5% of ET = 0.013);

L = 13 mg/l for gasoline cargo meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in 40 CFR 60.501.



Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable in a written agreement to the Ohio EPA, the Toledo Division of Environmental Services and the permittee.

5. The permittee shall operate the facility such that none of the facility parameters used to calculate results under B.4. is exceeded in any rolling 30-day period, and maintain records and provide reports in accordance with the provisions of 40 CFR 63.428(i).
6. The permittee shall report annually to the Administrator, and to the Toledo Division of Environmental Services, that the facility parameters established under B.4. have not been exceeded. At any time the permittee may submit a report to request modification of any facility parameter to the Administrator and the Toledo Division of Environmental Services for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
7. 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.



Final Permit-to-Install and Operate
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Two bay loading rack used to load gasoline, diesel, ethanol, and fuel additive into tank trucks

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)a., b)(2)a. through e., d)(1) through (9), e)(1), and f)(1)a. through 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 3745-31-05(D) | the combined stack emissions of volatile organic compounds (VOC) from emissions units J001, J002 and J003 shall not exceed 57.7 tons per rolling, 12-month period see b)(2)a. through b)(2)e. |
| b. | OAC rule 3745-21-09(Q) | see b)(2)f. |
| c. | 40 CFR Part 60, Subpart XX | exempt, see b)(2)g. |
| d. | 40 CFR Part 63, Subpart R | exempt, not a major source of HAPS per 40 CFR 63.420(a)(1) see b)(2)h. |

(2) Additional Terms and Conditions

a. The permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of RVP 15 gasoline.



- b. For organic liquids with a true vapor pressure greater than that of distillate fuel oil #2: the stack emissions of VOC shall not exceed 0.33 pound per 1,000 gallons (40 mg/l) loaded into the delivery vessel.
- c. For organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2: the emissions of VOC shall not exceed 0.038 pound of VOC per 1,000 gallons loaded into the delivery vessel.
- d. The combined annual throughputs of organic liquids in emissions units J001, J002 and J003 shall not exceed:
 - i. 322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2; and
 - ii. 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2.

Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.

- e. This stationary source category is not subject to a standard promulgated under section 111 or 112 of the Act before August 7, 1980, therefore fugitive emissions of criteria pollutants will not be considered in any determination of major source status for Title V purposes.
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- g. No construction or modification (as defined in by 40 CFR 60.14) which commenced after December 17, 1980, has affected those loading racks which deliver liquid product into gasoline tank trucks (as defined by 40 CFR 60.501).
- h. The permittee shall operate the facility such that none of the facility parameters used to calculate results under B.4. is exceeded in any rolling 30-day period, and maintain records and provide reports in accordance with the provisions of 40 CFR 63.428(i).

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 flare type 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 arcing of the flare's electric arc ignition system shall pulse continually.
 - (4) 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.
 - (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (6) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
 - (7) 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) For each day during which the permittee loads organic liquids with a true vapor pressure greater than that of RVP 15 gasoline in this emissions unit, the permittee shall maintain a record of the type and quantity of organic liquid loaded.
 - (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 properly install, operate, and maintain a device to continuously monitor the electric arc emission system when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - (4) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.



- (5) The permittee shall record all periods of time during which the flare was inoperable.
- (6) The permittee shall maintain daily records of the following information:
 - a. the total throughput for emissions units J001 and J003 (volumes loaded) for gasoline, and
 - b. the monthly total throughputs (volumes loaded) for emissions units J001 and J003.
- (7) The permittee shall maintain monthly records of the following information:
 - a. the total throughput (volumes loaded) for;
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per month; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per month.
 - b. the rolling, 12-month summations of the total throughputs (volumes loaded) for :
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per year; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per year.
 - c. the rolling, 12-month summations of the combined total throughputs (volumes loaded) for emissions units J001, J002 and J003 for:
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per year; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per year.
- (8) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which the electric arc ignition system or pilot flame is not functioning properly; and
 - b. a log or record of operating time for the capture (collection) system, the flare, the monitoring equipment, and the emissions unit.
- (9) 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. the daily throughput for emissions units J001 and J003 (volumes loaded) for gasoline;
- b. 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. any exceedances of the rolling, 12-month throughput limitations, along with the cause of each exceedance and an explanation of any corrective action taken to prevent similar exceedances; and
 - ii. all periods of time during which the flare's electric arc ignition system was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.
- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. 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 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).

- (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) 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.

f) Testing Requirements

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

a. Emission Limitation:

For organic liquids with a true vapor pressure greater than that of distillate fuel oil: the stack emissions of VOC shall not exceed 0.33 pound per 1,000 gallons (40 mg/l) loaded into the delivery vessel.

Applicable Compliance Method:

Compliance shall be demonstrated by the results of the most recent stack test performed on this emissions unit (0.25 pound VOC per 1,000 gallons of gasoline based on testing performed April 9, 2014).

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed OAC rule 3745-21-10(E). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

For organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil: the emissions of VOC shall not exceed 0.038 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emissions limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$$L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded



S = a saturation factor (1)

P = true vapor pressure, psia (distillate = 0.0065 - AP-42 Table 7.1-2)

M = molecular weight, lb/lb mole (distillate = 130)

T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

c. Emission Limitation:

the combined stack emissions of VOC from emissions units J001, J002 and J003 shall not exceed 57.7 tons per rolling, 12-month period

Applicable Compliance Method:

This emissions limitation was developed by a one-time worst case calculation based on the enforceable maximum throughput restrictions (322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2) and the enforceable emissions limitations for loading (0.33 pound VOC per 1,000 gallons for organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 0.038 pound of VOC per 1,000 gallons for organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2).

$$\frac{[(0.33 \text{ lb}/1000 \text{ gal})(322,368,000 \text{ gal}/\text{yr}) + (0.038 \text{ lb}/1000 \text{ gal})(234,000,000 \text{ gal})]}{2000 \text{ lb}/\text{ton}}$$

(2) 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 prior to permit expiration, and shall be performed between April 30 and May 31.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of VOC for gasoline loading.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 2A, 21 and 25B of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-21-10(E).
- d. 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 Toledo Division of Environmental Services.



- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services refusing to accept the results of the emission test(s).
 - f. Personnel from the Toledo Division of Environmental Services 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.
 - g. 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 Toledo Division of Environmental Services within 30 days following completion of the test(s).
- (3) This emissions unit has a stated maximum throughput of 322,368,000 gallons per year (883,200 gallons per day) of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2. Average daily throughput levels achieved during the April 9, 2014 stack testing for gasoline loading was 309,700 gallons per day. Ohio EPA stack testing policy requires a review of the stack test results for sources where the throughput exceeds more than 10% the production rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for VOC emissions. Operation at a throughput greater than the compliant level is not indicative of an emission violation, but rather serves as a trigger level for additional testing to demonstrate compliance with the emission limitations at the higher throughput rate. The permittee may increase the daily throughput by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-21-10(E), at a higher average daily throughput.
- g) Miscellaneous Requirements
- (1) None.



2. J002, Barge Loading

Operations, Property and/or Equipment Description:

Loading of diesel into barges

- 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)a., b)(2)a., d)(2), e)(2) and f)(1).
- 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(D) | <p>the combined stack emissions of volatile organic compounds (VOC) from emissions units J001, J002 and J003 shall not exceed 57.7 tons per rolling, 12-month period</p> <p>the emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 0.038 pound per 1,000 gallons of organic liquid loaded into the delivery vessel</p> <p>the permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of distillate fuel oil #2</p> <p>see b)(2)a.</p> |
| b. | OAC rule 3745-21-09(Q) | exempt, see b)(2)b. |



(2) Additional Terms and Conditions

- a. The combined annual throughputs of organic liquids in emissions units J001, J002 and J003 shall not exceed:
 - i. 322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2; and
 - ii. 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2.

Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.

- b. The permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of distillate fuel oil #2.

c) Operational Restrictions

- (1) The annual throughput of organic liquids in this emissions unit shall not exceed 234,000,000 gallons per year. Compliance with the annual limitation shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee loads gasoline (including transmix), ethanol, fuel additives or other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 in this emissions unit, the permittee shall maintain a record of the type and quantity of organic liquid loaded.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total throughputs (volumes loaded), in gallons per month; and
 - b. the rolling, 12-month summation of the total throughputs (volumes loaded), in gallons per year.
 - c. the rolling, 12-month summations of the combined total throughputs (volumes loaded) for emissions units J001, J002 and J003 for:
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per year; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per year.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than gasoline (including transmix), ethanol, fuel additives or other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 was loaded in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (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. any exceedances of the rolling, 12-month throughput limitation, along with the cause of each exceedance and an explanation of any corrective action taken to prevent similar exceedances.
 - 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 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) 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.

f) Testing Requirements

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

a. Emission Limitation:

The emissions of VOC shall not exceed 0.038 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emissions limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$$L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (1)

P = true vapor pressure, psia (distillate = 0.0065 - AP-42 Table 7.1-2)

M = molecular weight, lb/lb mole (distillate = 130)

T = temperature of bulk liquid, degrees R (520)

Compliance may be demonstrated through alternative U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

b. Emission Limitation:

the combined stack emissions of volatile organic compounds (VOC) from emissions units J001, J002 and J003 shall not exceed 57.7 tons per rolling, 12-month period

Applicable Compliance Method:

This emissions limitation was developed by a one-time worst case calculation based on the enforceable maximum throughput restrictions (322,368,000 gallons



per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2) and the enforceable emissions limitations for loading (0.33 pound VOC per 1,000 gallons for organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 0.038 pound of VOC per 1,000 gallons for organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2).

$$\frac{[(0.33 \text{ lb}/1000 \text{ gal})(322,368,000 \text{ gal/yr})+(0.038 \text{ lb}/1000 \text{ gal})(234,000,000 \text{ gal})]}{2000 \text{ lb/ton}}$$

g) Miscellaneous Requirements

- (1) None.



3. J003, Railcar Loading

Operations, Property and/or Equipment Description:

Loading of diesel into railcars

- 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)a., b)(1)b., b)(2)a. through e., d)(1) through (9), e)(1), and f)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3) (as established by PTI 04-1082 as modified on 5/12/99) | see b)(2)a. through b)(2)d. |
| b. | OAC rule 3745-31-05(D) | the combined stack emissions of volatile organic compounds (VOC) from emissions units J001, J002 and J003 shall not exceed 57.7 tons per rolling, 12-month period see b)(2)e. |
| c. | OAC rule 3745-21-09(Q) | see b)(2)f. |
| d. | 40 CFR Part 60, Subpart XX | exempt, see b)(2)g. |
| e. | 40 CFR Part 63, Subpart R | exempt, not a major source of HAPS per Section 63.420(a)(1) see b)(2)h. |



(2) Additional Terms and Conditions

- a. The permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of RVP 15 gasoline.
- b. For organic liquids with a true vapor pressure greater than that of distillate fuel oil #2: the stack emissions of VOC shall not exceed 0.33 pound per 1,000 gallons (40 mg/l) loaded into the delivery vessel.
- c. For organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2: the emissions of VOC shall not exceed 0.038 pound of VOC per 1,000 gallons loaded into the delivery vessel.
- d. The annual throughput of organic liquids in this emissions unit shall not exceed:
 - i. 322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2; and
 - ii. 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2.
- e. The combined annual throughputs of organic liquids in emissions units J001, J002 and J003 shall not exceed:
 - i. 322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2; and
 - ii. 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2.
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- g. Railcar loading at a bulk gasoline terminal is not an affected source.
- h. The permittee shall operate the facility such that none of the facility parameters used to calculate results under B.4. is exceeded in any rolling 30-day period, and maintain records and provide reports in accordance with the provisions of 40 CFR 63.428(i).

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 arcing of the flare's electric arc ignition system shall pulse continually.
 - (4) 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.
 - (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (6) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
 - (7) 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) For each day during which the permittee loads organic liquids with a true vapor pressure greater than that of RVP 15 gasoline in this emissions unit, the permittee shall maintain a record of the type and quantity of organic liquid loaded.
 - (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 properly install, operate, and maintain a device to continuously monitor the electric arc emission system when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - (4) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.



- (5) The permittee shall record all periods of time during which the flare was inoperable.
- (6) The permittee shall maintain daily records of the following information:
 - a. the total throughput for emissions units J001 and J003 (volumes loaded) for gasoline, and
 - b. the monthly total throughputs (volumes loaded) for emissions units J001 and J003.
- (7) The permittee shall maintain monthly records of the following information:
 - a. the total throughputs (volumes loaded) for this emissions unit for:
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per month; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per month.
 - b. the rolling, 12-month summations of the total throughputs (volumes loaded) for this emissions unit for:
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per year; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per year.
 - c. the rolling, 12-month summations of the combined total throughputs (volumes loaded) for emissions units J001, J002 and J003 for:
 - i. gasoline (including transmix), ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2, in gallons per year; and
 - ii. distillates, biodiesel and organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2, in gallons per year.
- (8) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which the electric arc ignition system or pilot flame is not functioning properly; and
 - b. a log or record of operating time for the capture (collection) system, the flare, the monitoring equipment, and the emissions unit.



- (9) 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.

e) Reporting Requirements

- (1) 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. any exceedances of the rolling, 12-month throughput limitations, along with the cause of each exceedance and an explanation of any corrective action taken to prevent similar exceedances; and
 - ii. all periods of time during which the flare's electric arc ignition system was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.
 - 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 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).

- (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) 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.

f) Testing Requirements

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

a. Emission Limitation:

For organic liquids with a true vapor pressure greater than that of distillate fuel oil: the stack emissions of VOC shall not exceed 0.33 pound per 1,000 gallons (40 mg/l) loaded into the delivery vessel.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed OAC rule 3745-21-10(E). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

For organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil: the emissions of VOC shall not exceed 0.038 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emissions limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$$L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (1)

P = true vapor pressure, psia (distillate = 0.0065 - AP-42 Table 7.1-2)



M = molecular weight, lb/lb mole (distillate = 130)

T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

c. Emission Limitation:

the stack emissions of VOC from this emissions unit shall not exceed 57.7 tons per rolling, 12-month period

Applicable Compliance Method:

This emissions limitation was developed by a one-time worst case calculation based on the enforceable maximum throughput restrictions (322,368,000 gallons per year of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 234,000,000 gallons per year of distillates biodiesel and other organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2) and the enforceable emissions limitations for loading (0.33 pound VOC per 1,000 gallons for organic liquids with a true vapor pressure greater than that of distillate fuel oil #2 and 0.038 pound of VOC per 1,000 gallons for organic liquids with a true vapor pressure equal to or less than that of distillate fuel oil #2).

$$\frac{[(0.33 \text{ lb}/1000 \text{ gal})(322,368,000 \text{ gal}/\text{yr})+(0.038 \text{ lb}/1000 \text{ gal})(234,000,000 \text{ gal})]}{2000 \text{ lb}/\text{ton}}$$

g) Miscellaneous Requirements

(1) None.



4. T002, 40,000 bbl fixed roof storage tank, tank 40-2

Operations, Property and/or Equipment Description:

40,000 BBL fixed roof tank, tank 40-2

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

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

(2) Additional Terms and Conditions

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

b. No construction, reconstruction or modification (as defined in by 40 CFR 60.14) which commenced after July 23, 1984, has affected this emissions unit.

c) Operational Restrictions

(1) None.



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.

e) **Reporting Requirements**

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

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:



Final Permit-to-Install and Operate
ARC TERMINALS HOLDINGS LLC
Permit Number: P0116704
Facility ID: 0448010123
Effective Date: 6/17/2014

- a. None.
- g) Miscellaneous Requirements
 - (1) None.



5. T010, New 40,000 BBL Tank

Operations, Property and/or Equipment Description:

40,000 BBL IFR tank

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) as effective 11/30/01 | see b)(2)a. and b. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | see b)(2)c. |
| c. | OAC rule 3745-21-09(L) | see c)(1) |
| d. | 40 CFR Part 60, Subpart A (40 CFR 60.1 through 60.19) | see b)(2)d. |
| e. | 40 CFR Part 60, Subpart Kb (40 CFR 60.110b through 60.117b) [In accordance with 63.110b, this subpart applies to each storage vessel with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids (VOL) for which construction commenced after July 23, 1984] | see b)(2)e. |



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR 60, Subpart Kb.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants emitted at less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b(1)a.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/year, taking into account the federally enforceable control requirements of 40 CFR Part 60, Subpart Kb.

- d. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- e. The permittee shall maintain a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely empty or subsequently emptied and refilled. When the roof is resting on leg supports, the process of filling, emptying or refilling shall be continuous and shall be accomplished as rapidly as possible;
 - ii. each internal floating roof shall be equipped with two seals mounted one above the other so that each forms a continuous closure that completely



covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

- iii. each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface;
- iv. each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e. no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;
- v. automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
- vi. rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;
- vii. each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;
- viii. each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and
- ix. each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

c) Operational Restrictions

- (1) 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; and



- 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;
 - b. the period of storage; and
 - c. 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 visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
- (4) The permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is present) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (5) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so



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

- (6) The permittee shall keep a record of each inspection performed as required by 60.113b(a). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- (7) The permittee shall keep copies of all records required by 40 CFR Part 60 subpart Kb, except for the record required by 60.116b(b), for at least 2 years.
- (8) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record will be kept for the life of the emissions unit.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) 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) Notify the Toledo Division of Environmental Services (TES) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 60.113b(a)(1) and (a)(4) to afford TES the opportunity to have an observer present. If the inspection required by 60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify TES at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by TES at least 7 days prior to the refilling.
- (3) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), the permittee shall submit a report to TES within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and the date the repair was made.
- (4) 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.
- (5) 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.

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) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

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

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

i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference see 40 CFR 60.17), unless the Toledo Division of Environmental Services specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

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



- c. For other liquids, the vapor pressure:
 - i. may be obtained from standard reference texts, or
 - ii. determined by ASTM Method D2879-83, 96, or 97 (incorporated by reference see 40 CFR 60.17); or
 - iii. measured by an appropriate method approved by the Administrator; or
 - iv. calculated by an appropriate method approved by the Administrator



6. Emissions Unit Group -Tanks exempt fr Kb applicability: T001, T003, T004, T008

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| T001 | Internal floating roof storage tank |
| T003 | Internal floating roof storage tank |
| T004 | Internal floating roof storage tank |
| T008 | Internal floating roof storage tank |

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | OAC rule 3745-21-09(L) | see c)(1) |
| b. | 40 CFR Part 60, Subpart Kb | Exempt, see b)(2)a. |

(2) Additional Terms and Conditions

a. No construction, reconstruction or modification (as defined in by 40 CFR 60.14) which commenced after July 23, 1984, has affected this emissions unit.

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; and
- 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) The permittee shall notify the director (the Toledo Division of Environmental Services) 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 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) 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.

- 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.



7. Emissions Unit Group -Tanks w/Kb applicability: T006, T007

| EU ID | Operations, Property and/or Equipment Description |
|-------|---|
| T006 | 560,700 gal. fixed roof gasoline storage tank with internal floating roof and submerged fill. |
| T007 | 15,100 bbl internal floating roof storage tank, tank 15-7 |

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)a., b)(1)b., b)(2)a., and f)(1)a.

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) | see b)(2)a. |
| b. | OAC rule 3745-31-05(D) | fugitive emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 2.38 tons per year see b)(2)b. |
| c. | OAC rule 3745-21-09(L) | see b)(2)c. |
| d. | 40 CFR 60 Subpart Kb | see b)(2)d. and b)(2)e. |

(2) Additional Terms and Conditions

a. The Federally Enforceable Permit to Install/Permit to Operate for this air contaminant source takes into account the following voluntary restrictions including the use of any applicable air pollution control equipment as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. maximum annual average vapor pressure of RVP 15; and
 - ii. maximum annual throughput of 322,368,000 gallons of gasoline per year as made Federally enforceable by Section C.1. for J001.
- b. The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit with the operating restrictions listed above; therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- c. The permittee shall demonstrate compliance with OAC rule 3745-21-09(L) by maintaining compliance with the requirements of 40 CFR Part 60, Subpart Kb as provided below.
- d. This emissions unit is subject to the applicable provisions of Subpart Kb of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- e. The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
- i. the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible;
 - ii. the internal floating roof shall be equipped with two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous;
 - iii. each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface;
 - iv. each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;



- v. automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
 - vi. rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;
 - vii. each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;
 - viii. each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and
 - ix. each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall:
 - a. visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
 - b. i. visually inspect the internal floating roof and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30 day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible;



and,

perform a visual inspection each time the storage vessel is emptied and degassed, in compliance with the terms and conditions of paragraph b.ii below, at intervals less than 10 years.

or,

ii. visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the PERMITTEE shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 5 years.

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

(2) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the source.

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

e) Reporting Requirements

(1) The permittee shall meet the following requirements:

a. furnish the Toledo Division of Environmental Services with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3); and

b. if a defect or failure is noted during any visual inspection, a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

(2) Notify the Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required to afford



the Toledo Division of Environmental Services the opportunity to have an observer present.

- (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) 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.

f) Testing Requirements

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

2.38 tons of VOC per year

Applicable Compliance Method:

Compliance shall be determined by estimating emissions using the most recent version of EPA's Tanks computer software or the most recent emission factors contained in AP-42 Chapter 7.

g) Miscellaneous Requirements

- (1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
 - a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the



maximum local monthly average ambient temperature as reported by the National Weather Service.

- b. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference see 40 CFR 60.17), unless the Toledo Division of Environmental Services specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
- c. For other liquids, the vapor pressure:
 - i. may be obtained from standard reference texts, or
 - ii. determined by ASTM Method D2879-83, 96, or 97 (incorporated by reference see 40 CFR 60.17); or
 - iii. measured by an appropriate method approved by the Administrator; or
 - iv. calculated by an appropriate method approved by the Administrator.