



9/2/2014

Certified Mail

Nathan Wheldon, PE  
 Hopedale Fractionation Facility  
 1515 Arapahoe Street  
 Suite 1600 - Tower 1  
 Denver, CO 80202-2137

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
 Facility ID: 0634005042  
 Permit Number: P0117240  
 Permit Type: Initial Installation  
 County: Harrison

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](http://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](http://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](http://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 Ohio EPA DAPC, Southeast District Office at (740)385-8501 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: Ohio EPA-SEDO



**FINAL**

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

Facility ID:	0634005042
Permit Number:	P0117240
Permit Type:	Initial Installation
Issued:	9/2/2014
Effective:	9/2/2014
Expiration:	9/30/2023





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

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**Final Permit-to-Install and Operate**  
Hopedale Fractionation Facility  
**Permit Number:** P0117240  
**Facility ID:** 0634005042  
**Effective Date:** 9/2/2014

## Authorization

Facility ID: 0634005042  
Application Number(s): A0050855, A0051470  
Permit Number: P0117240  
Permit Description: Initial installation PTIO for B003 (natural gas-fired process heater rated at a heat input capacity of 145 MMBtu/hr) and T002 (40,000-barrel natural gasoline storage tank equipped with a redundant mechanical VRU with a design control efficiency of 100%).  
Permit Type: Initial Installation  
Permit Fee: \$1,750.00  
Issue Date: 9/2/2014  
Effective Date: 9/2/2014  
Expiration Date: 9/30/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Hopedale Fractionation Facility  
West of Hwy 151, North of Giacobbi Rd  
Green Twp., OH 43986

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

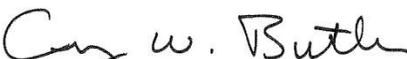
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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: P0117240  
 Permit Description: Initial installation PTIO for B003 (natural gas-fired process heater rated at a heat input capacity of 145 MMBtu/hr) and T002 (40,000-barrel natural gasoline storage tank equipped with a redundant mechanical VRU with a design control efficiency of 100%).

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

<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	B003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	T002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Hopedale Fractionation Facility  
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## **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**  
Hopedale Fractionation Facility  
**Permit Number:** P0117240  
**Facility ID:** 0634005042  
**Effective Date:** 9/2/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Hopedale Fractionation Facility

**Permit Number:** P0117240

**Facility ID:** 0634005042

**Effective Date:** 9/2/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. Emissions unit T002 contained in this permit is subject to 40 CFR Part 60, Subpart Kb and OOOO. 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://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office of local air agency.
3. Hopedale Fractionation Facility must comply with the Used Oil Management Standards of OAC Chapter 3745-279.
4. Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), for this project was not necessary because the emissions units not exempted from modeling per OEPA Engineering Guides #69 and #70, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
5. Risk Management Plans:

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.



**Final Permit-to-Install and Operate**  
Hopedale Fractionation Facility  
**Permit Number:** P0117240  
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**Effective Date:** 9/2/2014

## **C. Emissions Unit Terms and Conditions**



**1. B003, Hot Oil Heater #3**

**Operations, Property and/or Equipment Description:**

Hot Oil Heater #3 - Natural gas-fired process heater rated at a heat input capacity of 200 MMBtu/hr supporting the equipment used in the natural gas condensate fractionation process.

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) and ORC 3704.03(T)	Install a process heater that is designed to meet the emissions limitation of 0.04 lb/MMBtu of nitrogen oxides (NO <sub>x</sub> ).  Install a process heater that is designed to meet the emissions limitation of 0.041 lb/MMBtu of carbon monoxide (CO).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.55 ton per month averaged over a twelve-month, rolling period.  Volatile organic compound (VOC) emissions shall not exceed 0.40 ton per month averaged over a twelve-month, rolling period.  Sulfur dioxide emissions (SO <sub>2</sub> ) emissions



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		shall not exceed 0.04 ton per month averaged over a twelve-month, rolling period.  The requirements of this rule include compliance with OAC rule 3745-17-07(A) and 17-10(B)(1).  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/million BTU.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 6745-31-05 was revised to conform to ORC changes effective August 3, 2006, (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revisions has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for PE, VOC, and SO<sub>2</sub> is less than 10 tons/yr.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements



**Final Permit-to-Install and Operate**

Hopedale Fractionation Facility

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- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the process heater, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the process heater to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the process heater and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the process heater and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain a record of all operations during which the process heater was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Design Efficiency:

Install a process heater that is designed to meet the emissions limitation of 0.04 lb/MMBtu of NO<sub>x</sub>.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the manufacturer's guaranteed 0.004 lb/MMBtu emission factor.

If required, NO<sub>x</sub> emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Design Efficiency:

Install a process heater that is designed to meet the emissions limitation of 0.041 lb/MMBtu of CO.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the manufacturer's guaranteed 0.041 lb/MMBtu emission factor.

If required, CO emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

PE shall not exceed 0.55 ton per month averaged over a twelve-month, rolling period.



Applicable Compliance Method:

Compliance with the PE emissions limitation shall be based upon the following calculations using the inputs provided in the permittee's application:

$$[\text{Fuel Usage (MMscf/hr)} \times \text{PE Emissions Factor (lb/MMscf)}] = \text{PE lbs/hr}$$

$$(\text{PE lb/hr} \times 8,760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = \text{PE tons/yr}$$

$\text{PE tons/yr} / 12 \text{ months/year} = \text{PE tons per month averaged over a twelve-month, rolling period}$

Where:

Fuel Usage: 0.199 MMscf/hr, as defined in permittee's application

PE Emissions Factor: 7.60 lb/MMscf, as defined in AP-42 Section 1.4, Table 1.4-2

Therefore:

$$0.199 \text{ MMscf/hr} \times 7.60 \text{ lb/MMscf} = 1.51 \text{ lbs/hr}$$

$$(1.51 \text{ lb/hr} \times 8,760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = 6.62 \text{ tons/yr}$$

$6.62 \text{ tons/yr} / 12 \text{ months/yr} = 0.55 \text{ ton per month PE averaged over a twelve-month, rolling period}$

d. Emissions Limitation:

VOC emissions shall not exceed 0.40 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance with the VOC emissions limitation shall be based upon the following calculations using the inputs provided in the permittee's application:

$$\text{Fuel Usage (MMscf/hr)} \times \text{Emissions Factor (lb/MMscf)} = \text{VOC lb/hr}$$

$$(\text{VOC lb/hr} \times 8760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = \text{VOC tons/yr}$$

$\text{VOC tons/yr} / 12 \text{ months/year} = \text{VOC tons per month averaged over a twelve-month, rolling period}$

Where:

Fuel Usage: 0.199 MMscf/hr, as defined in permittee's application

VOC Emissions Factor: 5.50 lb/MMscf, as defined in AP-42 Section 1.4, Table 1.4-2



Therefore:

$$0.199 \text{ MMscf/hr} \times 5.50 \text{ lb/MMscf} = 1.09 \text{ lb/hr}$$

$$(1.09 \text{ lb/hr} \times 8,760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = 4.77 \text{ tons/yr}$$

$4.77 \text{ tons/yr} / 12 \text{ months/yr} = 0.40 \text{ ton per month VOC averaged over a twelve-month, rolling period}$

e. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 0.04 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emissions limitation shall be based upon the following calculations using the inputs provided in the permittee's application:

$$\text{Fuel Usage (MMscf/hr)} \times \text{Emissions Factor (lb/MMscf)} = \text{SO}_2 \text{ lb/hr}$$

$$(\text{SO}_2 \text{ lb/hr} \times 8,760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = \text{SO}_2 \text{ tons/yr}$$

$\text{SO}_2 \text{ tons/yr} / 12 \text{ months/year} = \text{SO}_2 \text{ tons per month averaged over a twelve-month, rolling period}$

Where:

Fuel Usage: 0.199 MMscf/hr, as defined in permittee's application

SO<sub>2</sub> Emissions Factor: 0.6 lb/MMscf, as defined in AP-42 Section 1.4, Table 1.4-2

Therefore:

$$0.199 \text{ MMscf/hr} \times 0.6 \text{ lb/MMscf} = 0.12 \text{ lb/hr}$$

$$(0.12 \text{ lb/hr} \times 8,760 \text{ hrs/yr}) / 2,000 \text{ lbs/ton} = 0.52 \text{ ton/yr}$$

$0.52 \text{ tons/yr} / 12 \text{ months/yr} = 0.04 \text{ ton per month SO}_2 \text{ averaged over a twelve-month, rolling period}$

f. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.



g. Emissions Limitation:

PE shall not exceed 0.020 lb/million BTU.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**2. T002, 40,000 Barrel Natural Gasoline Storage Tank**

**Operations, Property and/or Equipment Description:**

Natural Gasoline Storage Tank - One (1) 40,000 barrel (bbl) natural gasoline storage tank equipped with a redundant mechanical VRU with a design control efficiency of 100% routing all vapors to the inlet of the fractionation process.

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	Install a redundant vapor recovery unit (VRU) with a design control efficiency of 100% of volatile organic compounds (VOC) emissions.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-21-09(L)	The requirements of this rule are equivalent to the requirements of 40 CFR Part 60, Subpart Kb.  See c)(3) below.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)	See c)(1) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 60.110b(a), this emissions unit is a storage vessel with a capacity greater than or equal to 75 m <sup>3</sup> (19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction or modification commenced after July 23, 1984.]	
e.	40 CFR Part 60 Subpart OOOO (40 CFR 60.5360–60.5430)  [In accordance with 40 CFR 60.5365(e), this emissions unit is exempt from the Group 2 storage vessel affected facility designation provided that the potential for VOC emissions is less than 6 tons per year.]	Any vapor that is recovered and routed to a process through a VRU is not required to be included in the determination of VOC potential to emit for purposes of determining affected facility status provided the requirements of 60.5365 (e)(1)-(4) are met.  See c)(2) below.
f.	40 CFR Part 60 Subpart A (40 CFR 60.1-19)	Table 3 of 40 CFR Part 60 Subpart OOOO shows which provisions of Subpart A apply to this emissions unit.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006, (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has no yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then there emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/yr taking



into account the federally enforceable rule requirement for controls under NSPS Subparts Kb, OOOO, and OAC rule 3745-21-09(L).

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(a)(3)(i) and (ii)	Closed vent system and control device specifications.
60.113b(c)(2)	Operate in accordance with plan.

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5365(e)(1)-(4)	VRU potential to emit exemption requirements.
60.5411(b)	Cover requirements.
60.5411(c)	Closed vent system requirements.

- (3) 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 (b)-(d) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of any period of time the fixed roof tank does not comply with the requirements of OAC rule 3745-21-09(L)(1).
- (2) 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.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the VRU, along with documentation of any



modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (4) The permittee shall conduct periodic inspections of the VRU to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the VRU and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the VRU and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the VRU was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the VRU was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.115b(c)(1) and (2)	Keep records of VRU operating plan and measured values.
60.116b(a)	Maintain copies of all records required by 40 CFR Part 60, Subpart Kb for a period of two years, except that records



	required by 60.116b(b) must be kept for the life of the storage vessel.
60.116b(b)	Maintain records showing the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
60.116b(e)	Determine the true vapor pressure using available data on storage temperature as determined pursuant to 60.116b(e)(1)-(e)(3).
60.7(b)	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility and any malfunction of the air pollution control equipment.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113(c)(1)	Submit an operating plan.
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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. Design Efficiency:  
  
Install a redundant VRU with a design control efficiency of 100% of VOC emissions.



**Final Permit-to-Install and Operate**  
Hopedale Fractionation Facility  
**Permit Number:** P0117240  
**Facility ID:** 0634005042  
**Effective Date:** 9/2/2014

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's design control efficiency of 100% (per the permittee's permit application).

g) Miscellaneous Requirements

(1) None.