



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

Re: Permit to Install  
Franklin County  
Application No: 01-6376  
TOXIC REVIEW  
SYNTHETIC MINOR

CERTIFIED MAIL

November 19, 1997

MARATHON OIL COMPANY-COLUMBUS TERMINAL  
DAVID E. SIEBOLD  
539 S. MAIN STREET  
FINDLAY, OH 45840

CORRECTED COPY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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

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

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

  
Thomas G. Rigo, Manager  
Field Operations & Permit Section  
Division of Air Pollution Control

cc: ~~US EPA~~  
CENTRAL DISTRICT OFFICE, DAPC



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## Permit to Install Terms and Conditions

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Application No. 01-6376  
APS Premise No. 0125040071  
Permit Fee: \$4712.00

Name of Facility: MARATHON OIL COMPANY-COLUMBUS TERMINAL

Person to Contact: DAVID E. SIEBOLD

Address: 539 S. MAIN STREET  
FINDLAY, OH 45840

Location of proposed source(s): 4125 FISHER ROAD  
COLUMBUS, OHIO

Description of proposed source(s):  
PETROLEUM PRODUCTS DISTRIBUTION TERMINAL WITH VAPOR RECOVERY  
UNIT.

Date of Issuance: November 19, 1997

Effective Date: November 19, 1997

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights

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that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

#### SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for MARATHON OIL COMPANY-COLUMBUS TERMINAL located in Franklin County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
J001	Loading Rack with a carbon adsorption/gasoline absorption vapor recovery unit (VRU)	Gasoline Storage Tank Compliance with allowable emission limits and control requirements; Compliance with Ohio EPA's air toxics policy	3745-35-07 3745-21-09 (Q) NSPS Subpart XX  3745-35-07  3745-35-07	0.29 pound of VOC per 1,000 gallons (35 mg/l) gasoline loaded into the delivery vessel. 0.019 pound of VOC per 1,000 gallons distillates loaded into the delivery vessel. Total VOC emissions from gasoline and distillates loading shall not exceed 45.2 tons VOC per year (including Fugitive VOC emissions). The annual combined HAP and individual HAP emissions from this facility shall not exceed 24.9 tons per year and 9.9 tons per year, respectively.
T001	External Floating Roof Gasoline Storage Tank	Submerged fill, compliance with	3745-35-07 3745-21-09 (Z)	See Additional Special Terms and Conditions for control

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	(49,444 bbls)	allowable emission limits and applicable rules		requirements
T002	External Floating Roof Gasoline Storage Tank (28,499 bbls)	Submerged fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (Z)	See Additional Special Terms and Conditions for control requirements
T003	External Floating Roof Gasoline Storage Tank (17,793 bbls)	Submerged fill, compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (Z)	See Additional Special Terms and Conditions for control requirements
T004	External Floating Roof Gasoline Storage Tank (17,796 bbls)	Submerged fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (Z)	See Additional Special Terms and Conditions for control requirements
T005	Fixed Roof No. 1 Fuel Oil Storage Tank (24,047 bbls)	Submerged fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements
T006	Fixed Roof No. 2 Fuel	Submerged Fill,	3745-35-07 3745-21-09	See Additional Special Terms and

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<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T006	Oil Storage Tank (23,942 bbls #2 Fuel Oil)	Compliance with allowable emission limits and applicable rules	(L) (2)	Conditions for control requirements
T007	Fixed Roof No. 2 Fuel Oil Storage Tank (23,970 bbls)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements
T008	Fixed Roof Transmix Storage Tank (902 bbls).	Submerged fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements
T009	Internal Floating Roof Gasoline Storage Tank (77,121 bbls)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) NSPS Subpart K	See Additional Special Terms and Conditions for control requirements
T010	Internal Floating Roof Gasoline Storage Tank (28,247 bbls)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) NSPS Subpart K	See Additional Special Terms and Conditions for control requirements

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T011	Internal Floating Roof Gasoline Storage Tank (28,248 bbls)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) NSPS Subpart K	See Additional Special Terms and Conditions for control requirements
T012	Fixed Roof Additive Storage Tank (8,000 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements
T017	Fixed Roof Additive Storage Tank (8,000 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements
T018	Fixed Roof Denatured Alcohol Storage Tank (20,000 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2) NSPS Subpart Kb	See Additional Special Terms and Conditions for control requirements
T019	Fixed Roof Denatured Alcohol Storage Tank (20,000 gals)	Submerged Fill, Compliance with allowable emission limits and	3745-35-07 3745-21-09 (L) (2) NSPS Subpart Kb	See Additional Special Terms and Conditions for control requirements

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		applicable rules		
T020	Fixed Roof Denatured Alcohol Storage Tank (20,000 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2) NSPS Subpart Kb	See Additional Special Terms and Conditions for control requirements
T021	Fixed Roof Denatured Alcohol Storage Tank (20,000 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2) NSPS Subpart Kb	See Additional Special Terms and Conditions for control requirements
T022	Fixed Roof Automate Red B Storage Tank (495 gals)	Submerged Fill, Compliance with allowable emission limits and applicable rules	3745-35-07 3745-21-09 (L) (2)	See Additional Special Terms and Conditions for control requirements

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	92.4
CO	12.52
NO <sub>x</sub>	5.01
Total HAPs	24.9
Single HAP	9.9

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
J001	Loading Rack	XX
T009-T011	IFR Storage Tanks	K
T018-T021	Fixed Roof Storage Tanks	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, OH 43216-3669

and OEPA Central District Office - DAPC  
3232 Alum Creek Drive,  
Columbus, Ohio 43207-3417

**PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

Pollutants

J001

VOC

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NEW SOURCE PERFORMANCE STANDARD SUBPART K AND SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s):</u>	<u>Tank Size:</u>	<u>Maximum Vapor Pressure</u>
T009	77,121 bbls	5.7 psia at 60 deg F
T010	28,247 bbls	5.7 psia at 60 deg F
T011	28,248 bbls	5.7 psia at 60 deg F
T018	20,000 gals	0.619 psia at 60 deg F
T019	20,000 gals	0.619 psia at 60 deg F
T020	20,000 gals	0.619 psia at 60 deg F
T021	20,000 gals	0.619 psia at 60 deg F

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Emission Limitations

1. Annual Emissions Limitations for J001 (Loading Rack Gasoline Loading)

The total annual VOC emission from loading rack gasoline loading operations (including loading rack fugitive emissions), based upon a rolling 12-month average, shall not exceed the limit in the table below:

<u>Pollutant</u>	<u>Emission Limitation</u>
Volatile Organic Compounds	44.3 tons per year

2. Annual Emissions Limitations for J001 (Loading Rack Distillates Loading)

The total annual emissions from J001 shall not exceed the limit in the table below:

<u>Pollutant</u>	<u>Emission Limitation</u>
Volatile Organic Compounds	0.95 ton per year

3. Annual HAP Emission Limitation for the Facility

The total annual HAP emissions from the facility shall not exceed the limit specified in the table below:

<u>Pollutant</u>	<u>Emission Limitation</u>
Combined Hazardous Air Pollutants	24.9 tons/year
HAP Single	9.9 tons/year

4. Annual VOC Emission Limitation for Storage Tanks

The total annual VOC emissions from storage tanks units T001 through T012, and T017 through T022 shall not exceed the limit specified in the table below:

<u>Pollutant</u>	<u>Emission Limitation</u>
Volatile Organic Compounds	35.5 tons per year

Storage Tank VOC emissions shall be estimated using the USEPA Tanks version 2.0 or newer program. Total gasoline and distillates throughputs shall not exceed the limits specified in Operational Restrictions for Loading Rack and Storage Tanks (Section B(11) of this permit).

B. Operational Restrictions for Loading Rack (Emission Unit J001) and Storage Tanks

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. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
3. Compliance with the emission limitations as stated in Section A.1. and A.2 shall be achieved by restricting annual throughput of gasoline (i.e., gasoline, additives, and interface) and distillates (i.e., diesel and kerosene). The annual throughputs of gasoline and distillates shall not exceed 300,000,000 gallons per year

and 100,000,000 gallons per year, respectively. In order to ensure federal enforceability during the first twelve calendar months of operation after issuance of this permit to install, this emission unit shall not exceed the following product throughput limitations:

<u>MONTHS (s)</u>	<u>CUM GASOLINE (gallons)</u>	<u>CUM DISTILLATES (gallons)</u>
1-1	37,500,000	12,500,000
1-2	75,000,000	25,000,000
1-3	112,500,000	37,500,000
1-4	150,000,000	50,000,000
1-5	168,000,000	56,250,000
1-6	187,500,000	62,500,000
1-7	206,250,000	68,750,000
1-8	225,000,000	75,000,000
1-9	243,750,000	81,250,000
1-10	262,500,000	87,500,000
1-11	281,250,000	93,750,000
1-12	300,000,000	100,000,000

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

4. All fuel loading lines and vapor lines will be equipped with fittings that are vapor tight.
5. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation of the fuel.
6. The permittee shall repair within fifteen (15) days any leaks from the vapor collection system and the vapor control system which are employed to meet the requirements of OAC rule 3745-21-09(Q) (1), when such a leak is equal to or greater than one hundred percent (100%) of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
7. Any tank truck used in conjunction with this emissions unit must comply with the requirements of OAC rule 3745-21-09(V), if applicable.
8. The vapor recovery unit (VRU) shall be kept in good working order and shall be used at all times during the transfer of gasoline or distillates into fuel tank trucks (as defined by 40 CFR 60.501). Transfer of gasoline or distillates into tank trucks without vapor controls is prohibited. Any scheduled maintenance of air pollution control equipment shall be performed in accordance with

paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the Ohio EPA Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06.

9. The following VRU parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:
  - a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches Hg. The air purge solenoid shall open during the regeneration cycle;
  - b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;
  - c. to ensure a proper flow rate from the absorption tower to the carbon bed, a positive absorber pressure shall be maintained; and,
  - d. to ensure proper adsorption, the carbon bed temperatures, at all levels, shall not exceed 200 degrees F.

Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigative to establish correct operation.

10. Any liquid gasoline returned to a stationary storage tank from the vapor control system shall be free of entrained air to the extent possible with good engineering design.
11. The maximum annual throughput for emissions unit T001 through T012, and T017 through T022 shall not exceed 300,000,000 gallons gasoline and 100,000,000 gallons distillate.
12. When operating a standby portable VOC vapor combustion unit, the facility shall comply with the same emissions performance standards stated in Section A of the Additional Special Terms and Conditions of this permit that are applicable to the primary VRU.

**C. Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for the loading rack (J001):

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- a. the gasoline and ethanol throughputs for each month;
- b. the distillates throughput for each month;
- c. the volatile organic compound emission rate for the loading rack, in tons per month;
- d. the individual HAP emissions for each HAP, in tons per month;
- e. the total HAP emissions, in tons per month;
- f. during the first twelve (12) calendar months of operation following the issuance of this permit, the permittee shall maintain records of the cumulative throughput, in gallons of gasoline and distillates for each calendar month; and,
- g. beginning after the first twelve (12) calendar months of operation following the issuance of this permit, the permittee shall maintain the rolling 12-month summations of the total gasoline and distillates throughputs in gallons.

These records, as well as any supporting information and computations, shall be retained at the facility for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review, upon verbal or written request.

2. The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program for the VRU which has been approved by the Central District Office. This program shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption-absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspection by the Central District Office.
3. The permittee shall maintain the data required by the VRU manufacturer's recommended daily operating guidelines on a daily basis. The permittee shall submit a checklist to the Central District Office within 90 days of the issuance of this permit. Any subsequent deletions to this checklist shall be mutually agreeable to the permittee and the Central District Office.
4. The permittee shall collect and record, at a minimum, the following information for the control equipment on a daily basis:

- a. a log of the downtime for capture (collection) system, control device, and monitoring equipment when the associated emissions unit is in operation;
  - b. the vacuum pressure in inches Hg measured during the regeneration cycle;
  - c. the gasoline supply temperature in degrees F;
  - d. the absorber pressure in psi; and,
  - e. the carbon bed temperature in degrees F.
5. The permittee shall maintain annual records of the following information for storage tank units T001 through T012, and T017 through T022. These records shall address the data obtained for the previous calendar period (January to December):
- a. the aggregate gasoline and ethanol throughput for each year;
  - b. the aggregate distillates throughputs for each year;
  - c. the aggregate volatile organic compound emissions for storage tanks, in tons per year;
  - d. the aggregate amount of individual HAP emissions, in tons per year; and,
  - e. the aggregate amount of total HAP emissions, in tons per year.

These records, as well as any supporting information and computations, shall be retained at the facility for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review, upon verbal or written request.

**D. Reporting Requirements**

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

These semi-annual excursion reports shall include the following:

- c. an identification of each deviation;
- d. the probable cause of such deviation; and,
- e. any corrective actions or preventive measures which have been taken or will be taken.

These reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous 6-month calendar period (July to December and January to June, respectively). Excursion reports stating that no exceedances occurred during the semi-annual period are required.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC emission limitation, and the individual and total HAP emissions limitation. These reports shall be submitted by February 15 and August 15 for each year and shall address the data obtained during the previous 6-month calendar period (July to December and January to June, respectively). Excursion reports stating that no exceedances occurred during the semi-annual period are required.
3. The permittee shall submit an annual report of the total fuel throughputs, in gallons, for gasoline and distillates during the calendar year, and the estimated total VOC and HAP emissions from the loading rack (emissions unit J001) and the storage tank units. This annual report shall be submitted by February 15 of each year and shall address data for the previous calendar year (January through December).

**E. Testing Requirements**

1. The emission test methods and procedures are those outlined in OAC Rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 205,480 gallons (777,824 liters) of gasoline are loaded. (The test should be conducted at the maximum throughput possible).

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

No later than 30 days prior to proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to

Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test, and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

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

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

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

a. Emissions Limitation

0.29 pound VOC per thousand gallons of gasoline loaded

Applicable Compliance Method

OAC Rule 3745-21-10(E)

b. Emissions Limitation

0.019 pound VOC per thousand gallons of distillates loaded

Applicable Compliance Method

Use an emission factor from AP-42 of 0.016 pound of VOC per thousand gallons of kerosene, and an emission factor of 0.014 pound of VOC per thousand gallons of no. 2 fuel oil (distillate).

c. Emissions Limitation

~~44.0 tons VOC per year from gasoline loading~~

Applicable Compliance Method

The actual emissions shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2,000.

d. Emissions Limitation

0.95 ton VOC/year from the distillate(s) loading

Applicable Compliance Method

The actual emissions shall be calculated using the applicable compliance method specified in section E.2.b.

e. Emissions Limitation

9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs

Applicable Compliance Method

For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions (except storage tank VOC emissions) from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollution Speciation Methodology.

Benzene -	20.4 pounds per ton of VOC
Cumene -	0.20 pound per ton of VOC
Ethyl benzene -	2 pounds per ton of VOC
Hexane -	33.6 pounds per ton of VOC
Isooctane -	10.4 pounds per ton of VOC
Toluene -	33.2 pounds per ton of VOC
Xylenes -	11.6 pounds per ton of VOC

The HAP emissions from distillates (loading and fugitives) shall be determined using USEPA's "VOC/PM Speciation Data System," version 1.50, October, 1992.

f. Emissions Limitation

0.3 ton fugitive VOC losses per year from loading rack equipment

Applicable Compliance Method

VOC fugitive emissions (e.g., valves, fittings, and pumps) from the loading rack shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

g. Emissions Limitation

11.3 tons VOC losses per year from gasoline truck vapor losses.

Applicable Compliance Method

VOC emissions from gasoline truck loading operations shall be determined using the most recent VOC stack test results (0.0754 pound of VOC/1000 gallons gasoline loaded) or a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5 percent as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

F. Miscellaneous Requirements

Sections A, B, C, D, E and F of these terms and conditions constitute the federally enforceable portions of this permit.