



9/16/2014

TIM MCDONALD  
ACTION TERMINALS, INC.  
P.O. BOX 609  
PRESTONBURG, KY 41653

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

Facility ID: 0744010055  
Permit Number: P0117369  
Permit Type: Initial Installation  
County: Lawrence

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Ironton Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street Suite 700  
PO Box 1049  
Columbus, Ohio 43216-1049

and Portsmouth City Health Dept., Air Pollution Unit  
605 Washington Street  
3rd Floor  
Portsmouth, OH 45662

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Portsmouth; Kentucky; West Virginia





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Action Terminals is an existing bulk terminal located in Ironton, Ohio.

This permit is for the new installation of barge loading with submerged fill (J002) that will allow the loading of crude oil onto barges. The permittee has requested a combined crude oil throughput restriction of 76,650,000 gallons per year to be shared between the existing truck loading rack (J001) and this new barge loading operation (J002).

3. Facility Emissions and Attainment Status:

Action Terminals currently has a FESOP permit pending (P0091304) for the existing sources at the facility (J001, T001-T007) that includes a throughput restriction in order to ensure the potential to emit from the facility remains below Title V and major MACT thresholds for VOC and HAPs. The facility has throughput records documenting that the facility has been an inherent minor facility (i.e. actual emissions are less than 20% of the thresholds) for VOC and HAPs. The facility has been idle since July, 1999. The facility has requested a combined throughput restriction from the existing truck loading (J001) and the new barge loading (J002) of 76,650,000 gallons per year of crude oil and 1,533,000 gallons per year of distillates, as well as, throughput restriction on the storage tanks (T001 – T007). With these throughput restrictions, the facility's potential to emit for VOC will be 68.11 tons per year which is below the Title V threshold limit of 100 tons per year. The potential to emit of HAPs from the facility with the throughput restriction is also below the Title V threshold limit of 10 tpy of a single HAP and 25 tons per year for all combined HAPs.

Lawrence County is currently attainment for ozone.

4. Source Emissions:

The potential to emit from this barge loading operation (J002) with the crude oil throughput restriction of 76,650,000 gallon per year is 32.79 tons of VOC and 1.213 tons of all combined HAPs. Since the truck loading (J001) and barge loading (J002) shared the combined crude oil throughput restriction, only the worst case emissions, which are from J001, and emission from the storage tanks (T001-T007) were used to determine the total facility VOC and HAP emissions.

5. Conclusion:

The emission limitations, operational restrictions, monitoring, recordkeeping and reporting contained in this permit are adequate to ensure that the VOC and HAPS emissions remain below major threshold levels which avoids Tile V and major MACT requirements.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (J002)	32.79
VOC (facility)	68.11
Individual HAP	9.9
Combined HAPs	24.9



PUBLIC NOTICE  
9/16/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

ACTION TERMINALS, INC.

2914 SOUTH THIRD ST,

Ironton, OH 45638

Lawrence County

FACILITY DESC.: All Other Petroleum and Coal Products Manufacturing

PERMIT #: P0117369

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation of crude oil barge loading operation with submerged fill including federally enforceable throughput restrictions to avoid Title V requirements.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Anne Chamberlin, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ACTION TERMINALS, INC.**

Facility ID:	0744010055
Permit Number:	P0117369
Permit Type:	Initial Installation
Issued:	9/16/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
ACTION TERMINALS, INC.

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**Draft Permit-to-Install and Operate**

**ACTION TERMINALS, INC.**

**Permit Number: P0117369**

**Facility ID: 0744010055**

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0744010055  
Application Number(s): A0051345  
Permit Number: P0117369  
Permit Description: Initial installation of crude oil barge loading operation with submerged fill including federally enforceable throughput restrictions to avoid Title V requirements.  
Permit Type: Initial Installation  
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 9/16/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ACTION TERMINALS, INC.  
2914 SOUTH THIRD ST  
Ironton, OH 45638

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:

Portsmouth City Health Dept., Air Pollution Unit  
605 Washington Street  
3rd Floor  
Portsmouth, OH 45662  
(740)353-5156

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



**Draft Permit-to-Install and Operate**

**ACTION TERMINALS, INC.**

**Permit Number: P0117369**

**Facility ID: 0744010055**

**Effective Date:** To be entered upon final issuance

## **Authorization (continued)**

Permit Number: P0117369

Permit Description: Initial installation of crude oil barge loading operation with submerged fill including federally enforceable throughput restrictions to avoid Title V requirements.

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>J002</b>
Company Equipment ID:	barge loading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
ACTION TERMINALS, INC.  
**Permit Number:** P0117369  
**Facility ID:** 0744010055  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Portsmouth City Health Dept., Air Pollution Unit in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



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

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

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

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

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

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



**Draft Permit-to-Install and Operate**  
ACTION TERMINALS, INC.  
**Permit Number:** P0117369  
**Facility ID:** 0744010055  
**Effective Date:** To be entered upon final issuance

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2, B.3, B.4, B.5 and B.6
2. This permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the facility. The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:
  - a) The total combined annual emissions from all facility emissions units, including permit to install and operate, exempt, and "de minimis" emissions units, shall not exceed the following as rolling, 12-month summations:
    - (1) VOC emissions shall not exceed 68.11 tons;
    - (2) total combined HAPs emissions shall not exceed 24.9 tons; and
    - (3) any individual HAP emissions shall not exceed 9.9 tons.
  - b) Maximum annual throughput limitations for crude oil and/or distillates at the truck loading rack (J001) as specified in section C.1.c)(1) of PTIO P0091304 and barge loading (J002) as specified in section C.1.c)(1).
  - c) Maximum annual throughput limitations for storage tanks (T001 –T007) as specified in sections C.2.c)(1), C.3.c)(1) and C.4.c)(1) of PTIO P0091304..
3. The permittee shall collect and record the following VOC information each month for emissions units J001, J002 and T001-T007, combined, and "de minimis" and exempt emissions units:
  - a) the company identification of each petroleum liquid loaded or stored;
  - b) the calculated VOC emissions from all petroleum liquids loaded and/or stored in emissions units J001, J002 and T001-T007, combined, in tons;
  - c) the calculated VOC emissions from all petroleum liquids loaded and/or stored in "de minimis" and exempt emissions units, in tons;
  - d) the total VOC emissions from all petroleum liquids loaded and/or stored for all emissions units facility-wide combined, in tons [summation of B.3.b) and B.3.c)]; and



- e) after the first 12 calendar months following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.
4. The permittee shall collect and record the following HAP information each month for all emissions units at the facility, combined:
- a) the company identification of each petroleum liquid loaded and/or stored;
  - b) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in emissions units J001, J002 and T001-T007, combined, in tons, based on the following:
    - (1) multiply the VOC emissions from section B.3.b) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);
  - c) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in "de minimis" and exempt emissions units, in tons, based on the following:
    - (1) multiply the VOC emissions from section B.3.c) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);
  - d) the total emission rate for each individual HAP from all petroleum liquids loaded and/or stored, in tons [summation of B.4.b) and B.4.c)];
  - e) the total emission rate for total combined HAPs from all petroleum liquids stored and/or loaded, in tons [summation of B.4.d)]; and
  - f) after the first 12 calendar months following the issuance of this permit, the rolling, 12-month individual HAP emissions and total combined HAPs emissions, in tons.
5. The permittee shall submit quarterly deviation reports that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - (1) the rolling, 12-month VOC emission limitation of 68.11 tons;
    - (2) the rolling, 12-month individual HAP emission limitation of 9.9 tons;
    - (3) the rolling, 12-month total combined HAPs emission limitation of 24.9 tons;
    - (4) the probable cause of each deviation (excursion);
    - (5) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - (6) 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 Portsmouth local air agency. 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.

6. Testing Requirements

a) Compliance with the emission limitations in B.2.a) above shall be determined in accordance with the following method(s):

(1) Emission Limitation:

VOC emissions shall not exceed 68.11 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based upon the records required pursuant to B.3 above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

- a. VOC emissions from the storage tanks (T001-T007) shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.
- b. The VOC emissions from truck loading rack (J001) and barge loading (J002) shall be determined using emission factors from AP-42, Fifth Edition, Section 5.2. (6/08).

(2) Emission Limitations:

Total combined HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period from all facility emissions units.

Any individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be based upon the records required pursuant to B.4 above.



**Draft Permit-to-Install and Operate**  
ACTION TERMINALS, INC.  
**Permit Number:** P0117369  
**Facility ID:** 0744010055  
**Effective Date:** To be entered upon final issuance

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



1. J002, barge loading

Operations, Property and/or Equipment Description:

Barge loading of crude oil with submerged fill

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

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

a. None.

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

a. b)(1)b, c)(1), d)(1), 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.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 2.73 tons per month averaged over a rolling, 12-month period.
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See c)(3).  See Facility-Wide Terms and Conditions B.2 through B.6.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only load crude oil in this emissions unit.

(2) The permittee shall use submerged fill whenever this emissions unit is in operation.



- (3) The combined annual maximum throughput for emissions units J001 and J002 shall not exceed 76,650,000 gallons of crude oil per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Maximum Allowable Throughput for:

<u>Month(s)</u>	<u>Crude Oil (gal)</u>
1	6,387,500
1-2	12,775,000
1-3	19,162,500
1-4	25,550,000
1-5	31,937,500
1-6	38,325,000
1-7	44,712,500
1-8	51,100,000
1-9	57,487,500
1-10	63,875,000
1-11	70,262,500
1-12	76,650,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual crude oil throughput limitations shall be based upon a rolling, 12-month summation of the crude oil throughput amounts.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information on any day that material other than crude oil with a vapor pressure greater than 3.84 psia is loaded at this emissions unit:
  - a. name of material loaded;
  - b. volume of material loaded;
  - c. maximum true vapor pressure of material loaded;
  - d. vapor molecular weight of material loaded; and



- e. hazardous air pollutant content of material loaded, in percent by weight.
- (2) The permittee shall maintain monthly records of the following information:
- a. the total throughput of crude oil, in gallons;
  - b. during the first 12 calendar months of operation following issuance of this permit, the throughputs of crude oil, in gallons, from J001 and J002, combined;
  - c. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the crude oil, in gallons, from J001 and J002, combined; and
  - d. the rolling, 12-month summation of VOC emissions from emissions units J001 and J002, combined, in tons.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. identification of each day during which a material other than crude oil was loaded at this emissions unit along with the information required to be recorded under d)(1) for each such day;
  - b. identification of each day during which a material with a vapor pressure greater than 3.84 psia was loaded into the barges;
  - c. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month throughput limitation of crude oil from emissions units J001 and J002, combined;
  - d. the probable cause of each deviation (excursion);
  - e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - f. 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 (Portsmouth 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
  - (3) Unless other arrangements have been approved by the director, all notifications and reports required by the terms and conditions in this permit shall be submitted through the Ohio EPA's eBusiness Center: Air Services web service ("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:

VOC emissions shall not exceed 2.73 tons per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by using equations (2) and (3) in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2 (6/08) and information provided by the permittee to calculate the emission factor of 0.855 lb/1000 gallons. Multiply the emission factor of 0.855 lb/1000 gal by the monthly throughput in gallons and divide by 2000 lbs/ton. Add the current month's emissions to the previous 11 month's emissions and divide by 12 to get the monthly average emissions.
- g) Miscellaneous Requirements
- (1) None.