



10/16/2014

Steve Bland
CITGO PETROLEUM CORP - DAYTON TERMINAL
1800 FARR DR
DAYTON, OH 45404

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857040915
Permit Number: P0117680
Permit Type: Renewal
County: Montgomery

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

Certified Mail

Table with 2 columns: Yes/No and various permit conditions like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG.

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO PETROLEUM CORP - DAYTON TERMINAL**

Facility ID:	0857040915
Permit Number:	P0117680
Permit Type:	Renewal
Issued:	10/16/2014
Effective:	10/16/2014
Expiration:	10/16/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO PETROLEUM CORP - DAYTON TERMINAL

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Authorization

Facility ID: 0857040915
Application Number(s): A0051816
Permit Number: P0117680
Permit Description: FEPTIO renewal for the liquid fuels loading rack at a bulk liquid fuel terminal. Includes replacement of a vapor recovery unit with a vapor combustion unit.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/16/2014
Effective Date: 10/16/2014
Expiration Date: 10/16/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CITGO PETROLEUM CORP - DAYTON TERMINAL
1800 FARR DRIVE
DAYTON, OH 45404

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

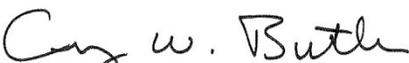
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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



Final Permit-to-Install and Operate
CITGO PETROLEUM CORP - DAYTON TERMINAL
Permit Number: P0117680
Facility ID: 0857040915
Effective Date: 10/16/2014

Authorization (continued)

Permit Number: P0117680

Permit Description: FEPTIO renewal for the liquid fuels loading rack at a bulk liquid fuel terminal. Includes replacement of a vapor recovery unit with a vapor combustion unit.

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

Emissions Unit ID:	J001
Company Equipment ID:	Loading Rack
Superseded Permit Number:	P0104301
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CITGO PETROLEUM CORP - DAYTON TERMINAL
Permit Number: P0117680
Facility ID: 0857040915
Effective Date: 10/16/2014

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
CITGO PETROLEUM CORP - DAYTON TERMINAL
Permit Number: P0117680
Facility ID: 0857040915
Effective Date: 10/16/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.3. through B.11.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:

<http://www.epa.gov/ttn/atw/area/arearules.html>
- Synthetic Minor VOC Emissions Limitations
3. The facility wide emissions of volatile organic compound (VOC) emissions shall not exceed 95.0 tons on a rolling 12-month basis.
4. The permittee shall collect and record the following information each month for all emissions units at the facility:
 - a) The combined VOC emissions, in tons, for all of the emissions units at the facility (the sum of the VOC emissions from each unit in operation at the facility calculated according to its monitoring and record keeping requirements); and
 - b) The rolling 12-month VOC emissions rate, in tons, (the sum of the monthly VOC emissions rates from 4.a) for the previous 12-months
5. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring and record keeping in this permit:
 - a) all exceedances of the rolling, 12-month emission limitation for VOC;
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

6. Compliance with the emission limitations in B.3. shall be determined in accordance with the following methods:

a) Emissions Limitation:

The facility wide emissions of volatile organic compound (VOC) emissions shall not exceed 95.0 tons on a rolling 12-month basis. .

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.4.

Synthetic Minor HAP Emissions Limitations

7. The facility wide emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons for any individual HAP and 24.9 tons on a rolling 12-month basis for any combination of HAPs. This emissions limitation includes actual HAP emissions from all loading rack activity, storage tanks, fugitive emissions from loading rack activity, fugitive emissions from process equipment (pumps, valves and connectors), and permit exempt sources in gasoline, petroleum distillate (e.g., diesel fuel, kerosene, aviation fuel) service.

8. The permittee shall collect and record the following information each month for all liquid materials containing any HAP:

- a) The identification of any liquid materials that contains HAP;
- b) The individual HAP composition each liquid material;
- c) The throughput, in gallons, of each liquid material;
- d) The individual HAP emissions rate for all liquid materials, in pounds or tons, per month (calculated using the formulas listed in U.S. EPA reference document AP-42, Sections 5.2 and 7.1 for each individual HAP);
- e) The rolling 12-month total individual HAP emissions, in tons, (the sum of the actual emissions from 4.d) for the previous 12 months); and
- f) The rolling 12-month total combined HAP emissions, in tons, (the sum of all the individual HAP emissions 4.e) for the previous 12 months).

9. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring and record keeping in this permit:



- a) all exceedances of the rolling, 12-month emission limitation for each individual HAP;
- b) all exceedances of the rolling, 12-month emission limitation for combined HAP;
- c) the probable cause of each deviation (excursion);
- d) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

10. The permittee shall also submit annual reports that specify the total individual HAP and combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
11. Compliance with the emission limitations in B.7. shall be determined in accordance with the following methods:
 - a) Emissions Limitation:

The individual HAP emissions from the facility shall not exceed 9.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.8. for each HAP.
 - b) Emissions Limitation:

The combined HAP emissions from the facility shall not exceed 24.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.8. for the combination of all HAPs.
12. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked



Final Permit-to-Install and Operate
CITGO PETROLEUM CORP - DAYTON TERMINAL
Permit Number: P0117680
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date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



Final Permit-to-Install and Operate
CITGO PETROLEUM CORP - DAYTON TERMINAL
Permit Number: P0117680
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Effective Date: 10/16/2014

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Bulk Gasoline Terminal Loading Rack with Vapor Combustion Unit

- 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) PTI 08-03708 issued June 6, 2006	<p>Volatile organic compound (VOC) emissions from the vapor control system shall not exceed 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.</p> <p>VOC emissions from this emissions unit shall not exceed 0.041 pound of VOC per 1000 gallons of ethanol loaded into the delivery vessel, including fugitive emissions.</p> <p>See b)(2)a. and c)(1) through c)(8).</p>
b.	OAC rule 3745-21-09(Q)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The VOC emissions limitation of 0.041 pound of VOC per 1000 gallons of ethanol loaded into the delivery vessel was established to reflect the potential to emit for this emissions unit. Therefore, is it not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.

c) Operational Restrictions

(1) The liquid fuel throughput for the loading rack shall not exceed:

Liquid Fuel	Volume (gallons on a rolling 12-month basis)
Gasoline	197,347,642
Distillate (diesel fuel and kerosene)	1,261,440,000
Ethanol	165,564,000

(2) 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.

(3) The loading rack shall be equipped with a vapor control system whereby:

- a. all vapors collected by the vapor collection system are vented to the vapor control system; and
- b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

(4) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

(6) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

(7) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal



to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

- (8) The pilot flame of the vapor combustion unit (VCU) shall be maintained at all times during the loading of gasoline (including gasoline, ethanol and gasoline additives) or distillates (i.e., diesel or diesel additives).

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

- (1) The permittee shall maintain the following monthly records for the loading rack:
- a. The total gasoline throughput (including additives), in gallons;
 - b. The VOC emissions rate from gasoline throughput (including additives), in tons, calculated according to the formulas listed in U.S. EPA reference document AP-42, Section 5.2;
 - c. The rolling 12-month total gasoline throughput (including additives), in gallons, (the sum of the monthly gasoline throughput rates for the previous 12-months);
 - d. The rolling 12-month VOC emissions rate from gasoline throughput (including additives), in tons, (the sum of the monthly VOC emissions rates for the previous 12-months);
 - e. the total distillate throughput, in gallons;
 - f. The VOC emissions rate from distillate loading, in tons, calculated according to the formulas listed in U.S. EPA reference document AP-42, Section 5.2;
 - g. The rolling 12-month total distillate throughput, in gallons, (the sum of the monthly gasoline throughput rates for the previous 12-months);
 - h. The rolling 12-month VOC emissions rate from distillate loading, in tons, (the sum of the monthly VOC emissions rates for the previous 12-months);
 - i. The total ethanol throughput, in gallons;
 - j. The VOC emissions rate from ethanol loading, in tons, calculated according to the formulas listed in U.S. EPA reference document AP-42, Section 5.2;
 - k. The rolling 12-month total ethanol throughput, in gallons, (the sum of the monthly gasoline throughput rates for the previous 12-months);
 - l. The rolling 12-month VOC emissions rate from ethanol loading, in tons, (the sum of the monthly VOC emissions rates for the previous 12-months); and
 - m. The total VOC emissions, in tons, (the sum of d)(1)b., d)(1)f., and d)(1)j.)
 - n. The total rolling 12-month VOC emissions rate, in tons, (the sum of the monthly VOC emissions rates from d)(1)m. for the previous 12 months).



- (2) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (3) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the lower explosive limit (LEL) as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (4) The loading rack, its vapor capture system and the VCU shall be interlocked so that fuel loading cannot occur unless the vapor capture system and VCU are operating. The permittee shall install, operate and maintain a heat sensing device (e.g., ultraviolet or thermocouple) to indicate the presence of a pilot flame when the emissions unit is operation. The monitoring device shall be installed, calibrated and maintained in accordance with the manufacturers recommendations, instructions and operating manuals. The permittee shall inspect the pilot flame and sensing device on a weekly basis.
- (5) The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the VCU which has been approved by the Regional Air Pollution Control Agency. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of a VCU. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the Regional Air Pollution Control Agency.
- (6) The permittee shall collect and record the following information each day:
 - a. The results of any pilot inspection;
 - b. A description of any failures of the flame detection system;
 - c. If a failure of the flame detection system is detected, the periods of time when gasoline was loaded until the system is repaired;
 - d. A log of the operating time for the:
 - i. Loading Rack
 - ii. Capture (collection) system,
 - iii. VCU; and
 - iv. Monitoring equipment



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify 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:
 - a. Any exceedances of the rolling 12-month gasoline throughput limitation;
 - b. Any exceedances of the rolling 12-month distillate throughput limitation;
 - c. Any exceedances of the rolling 12-month alcohol throughput limitation;
 - 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.

- (2) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.
- (3) The permittee shall submit annual reports that summarize the following information:
 - a. the total annual gasoline throughput rate, in gallons;
 - b) the total annual distillate throughput rate, in gallons;
 - c) the total annual ethanol throughput rate, in gallons;
 - d) the total annual VOC emissions, in tons;

These reports shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.

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



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

f) Testing Requirements

(1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC emissions from the vapor control system shall not exceed 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

Applicable Compliance Method

Compliance with the lb VOC/1000 gallons of gasoline loaded emission limitation above shall be based upon the results of emission tests conducted in accordance with the procedures outlined in f)(1) of this permit.

b. Emission Limitation

VOC emissions from this emissions unit shall not exceed 0.041 pound of VOC per 1000 gallons of ethanol loaded into the delivery vessel, including fugitive emissions.

Applicable Compliance Method

Compliance with the lb VOC/1000 gallons of ethanol loaded emission limitation shall be determined using Equation 1 from AP-42 Section 5.2 (1/95) and a control efficiency of 98.1% and a capture efficiency of 98.7% from AP-42 Section 5.2 (1/95).

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

a. The emission testing shall be conducted on a recurring five year basis. The last compliance demonstration was completed on July 29, 2014.



- b. The emission testing shall be conducted to demonstrate compliance with the emissions limitation of 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.
- c. The emission test must be completed in accordance with OAC rule 3745-21-10(E) and the testing requirements of 40 CFR Part 60, Subpart XX.
- d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- g) Miscellaneous Requirements
 - (1) None.