OhioEPA

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

11/13/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	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

Kevin Cunningham
Plains Marketing LP - Toronto Terminal
740306 S. 3510 Rd.
Cushing, OK 74023

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0641185004
Permit Number: P0115667
Permit Type: Initial Installation
County: Jefferson

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-SEDO

Response to Comments

Facility ID:	0641185004
Facility Name:	Plains Marketing LP - Toronto Terminal
Facility Description:	Light crude oil storage and distribution facility
Facility Address:	State Rd 7F Toronto, OH 43964 Jefferson County
Permit:	P0115667, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Herald Star on 08/02/2014. The comment period ended on 09/01/2014.	
Hearing date (if held)	**10/16/2014**
Hearing Public Notice Date (if different from draft public notice)	9/8/2014

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Potential Contamination of Natural Water Sources Surrounding the Proposed Facility

a. Comments: "I have water concerns, for example."

"What are the regulations safeguarding our waterways, particularly the Ohio River? We have several cities and towns that draw their water from the river, this particulate matter making its way into the river from the burn-off process, radium 228 and 226 making its way into the river from the burn-off process, or even them leaking out of the barges during this process."

"I mean, is it sane to put a 25-million gallon storage facility on the drinking water source of thousands of people? I mean, I remember, and some of the older people in here that were around in Toronto in 1988, when Ashland had that mistake and they collapsed the oil tanker. That was a 1-million-gallon spill and that shut down some of the intakes for almost a week. We were without water for four days when I lived on Sunset Drive. This is going to have 25 times that amount of storage capability."

"Do those communities have wastewater protection plans in place? Are their fire departments capable of handling a spill should this happen?"

"We have enough pollution in this water system."

b. Response: Ohio EPA Division of Air Pollution Control (DAPC) Permits (installation or operation) do not evaluate or take into account potential water concerns at a proposed facility. On 10/24/2013, DAPC circulated a Multi-Media Input Form notifying all other Southeast District Office (SEDO) divisions of the proposed facility and its operations. Water concerns may be directed to Ohio EPA's Division of Surface Water (DSW), Division of Drinking and Ground Waters (DDAGW), the Ohio Department of Natural Resources (ODNR) and/or the U.S. Coast Guard.

2. Topic: Potential Air Inversions

a. Comment: "I'm also very concerned that this is going in an inversion prone area and that the Ohio EPA doesn't seem to have the authority to monitor it adequately, as the standard is once every five years, plus whenever someone gets up the nerve to complain."

b. Response: The requested federally enforceable allowable emissions of criteria pollutants do not exceed thresholds that would require air dispersion modeling for the proposed facility. The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) to safeguard the public health and welfare from selected air pollutants. Jefferson County, Toronto Ohio is in attainment (meets the NAAQS) for all pollutants. Synthetic minor facilities with federally enforceable PTIOs are required to be inspected every 5 years and the permit requires annual compliance reporting requirements.

3. Topic: Potential Radium 226 and 228 Contamination.

a. Comments: "…the biggest question I have is pertaining to radium 228 and 226. The question I would like to see answered is, is radium 228 and 226 going to be monitored? How much of it are they expecting to be burned off at this facility? Or actually no burnt off, because it won't be burnt off. But is there going to be any type of control procedures put in place to monitor the emissions of 228, 226?"

"…radium 228 and 226 making its way into the river from the burn-off process, or even them leaking out of the barges during this process."

"There's nothing in the documents presented to this audience that says about radium control, and it's a fact. I know people working at these sites driving trucks wear badges. Most of them take the badges and leave it behind somewhere so it doesn't register, because they don't want to lose their job. If they are interested here in putting it on the ground, what's going to be here when it's in this town?"

b. Response: Ohio EPA, DAPC does not have delegated authority to regulate radioactive emissions. Concerns regarding radioactive materials may be directed to U.S. EPA Region V and/or ODNR.

4. Topic: Volatile organic compound (VOC) emissions

a. Comments: "Also, my concern is, is the amount of volatile material put into the atmosphere through the burning off process. It says they are permitted right now for under a hundred tons per year."

"Another issue that I am worried about is the VOCs, the fact that they are not going to monitor them for the types of VOCs. A lot of these compounds, like benzene, toluene, and hexane, are endocrine disrupters. It doesn't take much to disrupt an endocrine system. We are already demasculinizing our male species with the chemicals that we have in the environment right now. There are carcinogens. Benzene is a known carcinogen, and it is found in gas. That's a fact."

b. Response: The draft FEPTIO has a VOC emissions limit that was developed utilizing DAPC policy and the best available technology approach to set an appropriate VOC emissions limit for the specific process. Ohio air toxics were evaluated as part of the application process, air toxics such as Benzene or Toluene did not reach thresholds that require specific permitting requirements. In addition to the VOC emissions limit, the FEPTIO terms and conditions require Plains Marketing LP – Toronto Terminal not to exceed the emissions limit and keep records that demonstrate compliance with the VOC emissions limit. This approach is used by DAPC when permitting all FEPTIO facilities.

5. Topic: Additional Facilities in the Future

a. Comments: "My question is how many of these other burn-off facilities are going to be incorporated at this facility, and how are they going to be monitored?"

"Is there any other facility that's going to be proposed in the future to be put at this site, i.e., like a compressor-station-type facility that might be draw in, via because they might be bringing in – right now it's proposed to bring in the crude via truck, but are we possibly looking at pipelines running into this facility from various drill sites from the burning -off process?"

b. Response: Ohio EPA is currently unaware of any other proposed facilities in this area. There is not a general prohibition that prevents another facility from being constructed adjacent to the Toronto Terminal. If a new facility were to request an installation and operation permit adjacent to this facility, the new facility would be required to submit an application and Ohio EPA would require an aggregation analysis as part of the application. An aggregation analysis is a three prong test to determine if the facilities should be permitted as one facility.

6. Topic: Particulate Matter Emissions

a. Comment: "The other question I have is pertaining to the microns. Who is monitoring those microns? Is it going to be done on a regular basis, or is it going to be done every five years? Is there going to be a follow-up on that in five years or is it something that is going to be done…I'm talking about particulate matter, yes."

b. Response: The draft FEPTIO has a particulate emissions limit that was developed utilizing DAPC policy and the best available technology approach to set an appropriate particulate emissions limit for the specific process. In addition to the particulate emissions limit, the FEPTIO terms and conditions require Plains Marketing LP – Toronto Terminal not to exceed the emissions limit and keep records that demonstrate compliance with the particulate emissions limit. This approach is used by DAPC when permitting all FEPTIO facilities. Ohio EPA performs inspections at a minimum frequency of once every 5 years and typically when a complaint is reported.

7. Topic: Fire Safety

a. Comment: "Are their fire departments capable of handling a spill should this happen? I don't' know anybody that would want going into a fire with that kind of BTU values when you are burning oil."

b. Response: Ohio EPA does not have the authority require an applicant to demonstrate that a local entity is capable of handling emergency preparedness, including fire response. Please contact the local fire department and the county emergency management agency.

8. Topic: Property Value

a. Comment: "…I was lucky enough to see the new high school and junior high they built in Toronto. Brand new school, beautiful school. I was very proud to be a part of that community, and I see this coming up in the north end of town. What's this going to do to property values? When somebody comes here to look at a home, they are going say, 'Wow, here's a brand new home, but up here is a 25-million-gallon storage tank for an oil refinery,' basically."

b. Response: Ohio EPA does not have the regulatory authority to address if any facility will negatively impact property values.

9. Topic: Truck Traffic

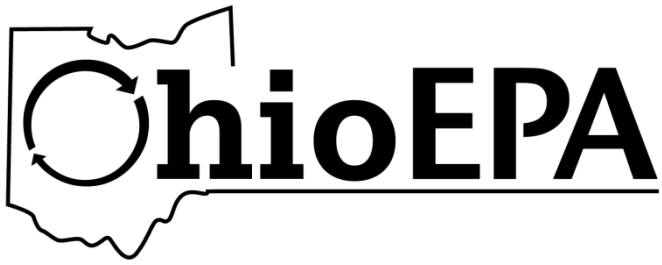
a. Comment: "Another thing I am worried about is the truck traffic and the fact that these tankers, just from oil and gas fracking, are absolutely ridiculous right now. Now we are going to put other tankers on the highways going through little communities."

b. Response: Ohio EPA does not have the authority to address truck traffic outside of the facility perimeter. In the application for the Toronto Terminal, truck traffic particulate emissions was evaluated and determined to be under permitting thresholds.

10. Topic: Historical Review

a. Comment: "*Toronto Edison Site Reuse Under Historical Review* and the study said visual impact from the oil storage tanks will be minimal."

b. Response: Ohio EPA does not have the regulatory authority to address visual impacts or historical significance.



FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plains Marketing LP - Toronto Terminal

Facility ID:	0641185004
Permit Number:	P0115667
Permit Type:	Initial Installation
Issued:	11/13/2014
Effective:	11/13/2014
Expiration:	11/13/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plains Marketing LP - Toronto Terminal

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Authorization

Facility ID:	0641185004
Application Number(s):	A0048823
Permit Number:	P0115667
Permit Description:	Initial installation permit for tank storage and barge loading, controlled by a flare, of light crude oil.
Permit Type:	Initial Installation
Permit Fee:	$5,250.00
Issue Date:	11/13/2014
Effective Date:	11/13/2014
Expiration Date:	11/13/2019

Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Plains Marketing LP - Toronto Terminal
State Rd 7F
Toronto, OH 43964

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0115667
Permit Description: Initial installation permit for tank storage and barge loading, controlled by a flare, of light crude oil.

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: J001
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T001**
Company Equipment ID: T001
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T002**
Company Equipment ID: T002
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T003**
Company Equipment ID: T003
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T004**
Company Equipment ID: T004
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T005**
Company Equipment ID: T005
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T006**
Company Equipment ID: T006
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T007**
Company Equipment ID: T007
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **T008**
Company Equipment ID: T008
Superseded Permit Number:
General Permit Category and Type: Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) None.

C. Emissions Unit Terms and Conditions

1. J001, Barge Loading controlled by flare

Operations, Property and/or Equipment Description:

420,000 gallons per hour light crude oil barge loading with a synthetic minor annual throughput restriction of 438,438,000 gallons per year controlled by a 131.02 MMBtu/hr flare (0.31 MMBtu/hr pilot, 18.42 MMBtu/hr enrichment gas, and 112.29 MMBtu/hr controlled vapors) with 100% capture efficiency and 98% control efficiency.

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. g)(1).

(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)e., c)(1)-(5), d)(1)-(2), and e)(3).

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) and OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 2.42 tons per month (TPM), averaged over a rolling, 12-month period. Carbon monoxide (CO) emissions shall not exceed 1.42 TPM, averaged over a rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxide (NO_x) emissions shall not exceed 0.76 TPM, averaged over a rolling, 12-month period. Sulfur dioxide (SO_2) shall not exceed 0.003 TPM, averaged over a rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate matter (PM_{10}) emissions shall not exceed 0.03 TPM, averaged over a rolling 12-month period. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
d.	OAC rule 3745-31-05(F), as effective 12/01/06	See b)(2)c. below.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid TV)	VOC emissions shall not exceed 55.70 pounds per hour (lbs/hr) and 29.08 tons per year (TPY), as a rolling, 12-month summation. See c)(1) below.

(2) Additional Terms and Conditions

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO_2 and PM emissions from this air contaminant source since the uncontrolled potential to emit for SO_2 and PM is less than 10 TPY.

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

PTIO P0115667 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. The annual throughput for this emissions unit shall not exceed 438,438,000 gallons.

ii. NO_x emissions shall not exceed 9.16 TPY.

c) Operational Restrictions

(1) The maximum annual throughput for this emissions unit shall not exceed 438,438,000 gallons, as a rolling 12-month summation.

a. To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the production levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (Gallons)
1	36,536,500
1-2	73,073,000
1-3	109,609,500
1-4	146,146,000
1-5	182,682,500
1-6	219,219,000
1-7	255,755,500
1-8	292,292,000
1-9	328,828,500
1-10	365,365,000
1-11	401,901,500
1-12	438,438,000

b. After the first 12 calendar months of operation, compliance with the annual limitation shall be based upon a rolling, 12-month summation of the monthly values.

(2) This emissions unit shall not be operated without the associated flare.

(3) The flare shall be operated with a flame present at all times when gases are vented to it.

(4) An automatic flame ignition system shall be installed to meet one of the following requirements:

a. If using a pilot flame ignition system, the presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. A pilot flame shall be maintained at all times in the flare's pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound; or

b. If using an electric arc ignition system, the arcing of the electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor the electric arc ignition system.

(5) The flare, its auto ignition system, and its recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall:

a. continuously monitor the presence of the flame;

b. record all periods during which the automatic flare ignition system (pilot flame or electronic arc ignition system) or thermocouple was not working and gas was being vented to the flare/combustion device; and

c. record all periods of time during which gas was being vented to the flare/combustion device and there was no flame.

(2) The permittee shall maintain monthly records of the following information:

a. The total quantity of light crude oil loaded into barges, in gallons;

b. The rolling, 12-month summation of light crude oil loaded into barges, and for the first 12 calendar months of operation the cumulative total, in gallons;

c. The total quantity of VOC emissions; and

d. The rolling, 12-month summation of VOC emissions.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permitteeshall submit the PER in the form and manner provided by the director by the due dateidentified in the Authorization section of this permit. The permit evaluation report shallcover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

a. The permittee shall identify the following additional information in the annual permit evaluation report:

i. all periods of time when the pilot flame or electronic arc ignition system is not working, including the date, time, and duration of each such period.

(3) The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:

a. The rolling, 12-month and first 12 months' cumulative light crude oil throughput limitations.

b. The rolling, 12-month VOC emissions limitation.

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. Emissions Limitation:

VOC emissions shall not exceed 55.70 lb/hr, 29.08 TPY, and 2.42 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the lb/h, TPY, and TPM emissions limitation shall be demonstrated by the following calculations using the AP-42 section 5.2 emission factor for barge loading, AP-42 section 1.4 for the generation of secondary emissions through combustion of light crude vapors in the vapor combustion unit, the maximum hourly throughput, the maximum annual throughput (438,438,000 gal/yr), the maximum hourly and annual heat loading to the vapor combustion unit, and the control efficiency of the flare (98%):

$$\text{Barge Loading Loss } (L_L) \text{ (in lbs/1000 gal)} = 12.46 \frac{SPM}{T}$$

S (S factor) = 0.5

P (true vapor pressure) = 11.1 psia

M (molecular weight) = 50 lb/lb-mole

T (temperature) = 528° Rankin

L_L = 6.55 lbs/1000 gal

6.55 lbs/1000 gal * 438,438 thousand gal/yr * 1 ton/2000 lbs = 1,435.88 TPY uncontrolled, and

139,132 MMBtu/yr * 5.39E-03 lb/MMBtu * 1 ton/2000 lbs = 0.38 TPY

1,435.88 TPY * (1 – 0.98) + 0.38 = **29.08 TPY controlled**

(29.08 TPY) / (12 mos/yr) = **2.42 TPM**

6.55 lbs/1000 gal * 420,000 gal/hr = 2,750 lb/hr uncontrolled, and

131.02 MMBtu/hr * 5.39E-03 lb/MMBtu = 0.71 lb/hr

2,750 lb/hr * (1 – 0.98) + 0.71 = **55.70 lb/hr controlled**

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 25 or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

CO emissions shall not exceed 1.42 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the TPM emissionslimitation shall be demonstrated by the following calculations using the AP-42 Table 1.4-1 emission factor (84 lbs CO/MMscf) for pilot and enrichment gas emissions and the TNRCC RG-109 “Air Permits Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers”, Table 4 emission factor (0.276 lb CO/MMBtu) for “flares combusting high-Btu waste streams” for emissions from combustion of controlled vapors:

Pilot:

84 lbs/MMscf * 300 scf/hr * 1MMscf/1,000,000 scf * 8760 hrs/yr * 1 ton/2000 lbs = 0.11 TPY

Enrichment Gas:

84 lbs/MMscf * 18,060 scf/hr * 1MMscf/1,000,000 scf = 1.52 lb/hr

(1.52 lb/hr) / (18.42 MMBtu/hr) = 0.083 lb/MMBtu

0.083 lb/MMBtu * 19,230 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 0.80 TPY

Controlled Vapors:

0.276 lb/MMBtu * 117,221 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 16.18 TPY

Total: 0.11 TPY + 0.80 TPY + 16.18 TPY = **17.09 TPY**

(17.09 TPY) / (12 mos/yr) = **1.42 TPM**

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitations:

NO_x emissions shall not exceed 0.76 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the TPM emissionslimitation shall be demonstrated by the following calculations using the AP-42 Table 1.4-1 emission factor (100 lbsNO_x/MMscf) for pilot and enrichment gas emissions and the TNRCC RG-109 “Air Permits Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers”, Table 4 emission factor (0.138 lbNO_x/MMBtu) for “flares combusting high-Btu waste streams” for emissions from combustion of controlled vapors:

Pilot:

100 lbs/MMscf * 300 scf/hr * 1MMscf/1,000,000 scf * 8760 hrs/yr * 1 ton/2000 lbs = 0.13 TPY

Enrichment Gas:

100 lbs/MMscf * 18,060 scf/hr * 1MMscf/1,000,000 scf = 1.806 lb/hr

(1.81 lb/hr) / (18.42 MMBtu/hr) = 0.098 lb/MMBtu

0.098 lb/MMBtu * 19,230 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 0.94 TPY

Controlled Vapors:

0.138 lb/MMBtu * 117,221 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 8.09 TPY

Total: 0.13 TPY + 0.94 TPY + 8.09 TPY = **9.16 TPY**

(9.16 TPY) / (12 mos/yr) = **0.76 TPM**

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative

U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emission Limitation:

SO_2 shall not exceed 0.003 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the TPM emissionslimitation shall be demonstrated by the following calculations using the AP-42 Table 1.4-2 emission factor (0.6 lbs SO_2/MMscf):

Pilot:

0.6 lbs/MMscf * 300 scf/hr * 1MMscf/1,000,000 scf * 8760 hrs/yr * 1 ton/2000 lbs = 0.00079 TPY

Enrichment Gas:

0.6 lbs/MMscf * 18,060 scf/hr * 1MMscf/1,000,000 scf = 0.011 lb/hr

(0.011 lb/hr) / (18.42 MMBtu/hr) = 0.00059 lb/MMBtu

0.00059 lb/MMBtu * 19,230 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 0.0057 TPY

Controlled Vapors:

117,221 MMBtu/yr * 0.6 lb/mmscf / 1,020 Btu/scf * 1 ton/2000 lbs = 0.0345 TPY

Total: 0.00079 TPY + 0.0057 TPY + 0.0345 TPY = **0.041 TPY**

(0.041 TPY) / (12 mos/yr) = **0.003 TPM**

If required, SO_2 emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office

e. Emissions Limitations:

PM_{10} shall not exceed 0.03 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the TPM emissionslimitation shall be demonstrated by the following calculations using the AP-42 Table 1.4-2 emission factor (5.7 lbscondensible PM/MMscf):

Pilot:

5.7 lbs/MMscf * 300 scf/hr * 1MMscf/1,000,000 scf * 8760 hrs/yr * 1 ton/2000 lbs = 0.0075 TPY

Enrichment Gas:

5.7 lbs/MMscf * 18,060 scf/hr * 1MMscf/1,000,000 scf = 0.10 lb/hr

(0.10 lb/hr) / (18.42 MMBtu/hr) = 0.0054 lb/MMBtu

0.0054 lb/MMBtu * 19,230 MMBtu/yr (as submitted in application) * 1 ton/2000 lbs = 0.054 TPY

Controlled Vapors:

117,221 MMBtu/yr * 5.7 lb/mmscf / 1,020 Btu/scf * 1 ton/2000 lbs = 0.33 TPY

Total: 0.0075 TPY + 0.054 TPY + 0.33 TPY = **0.39 TPY**

(0.39 TPY) / (12 mos/yr) = **0.03 TPM**

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

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.

2. T001-T004, Tank #'s 1 - 4

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T001	42,000 gallon (1,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T001-4.
T002	42,000 gallon (1,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T001-4.
T003	42,000 gallon (1,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T001-4.
T004	42,000 gallon (1,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T001-4.

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. g)(1).

(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)(2), d)(2)-(3), and e)(5).

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) and OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 1.36 TPM, averaged over a rolling, 12-month period. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb. See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid TV)	VOC emissions shall not exceed 3.73 lbs/hr and 16.32 TPY, as a rolling, 12-month summation.
c.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b) [In accordance with 40 CFR 60.110b, this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.]	The permittee shall equip each storage vessel with a fixed roof in combination with an internal floating roof that meets the specifications of 40 CFR 60.112b(a)(1).
d.	40 CFR, Part 60, Subpart A [40 CFR 60.1 through 60.9]	General Provisions
e.	OAC rule 3745-21-09(L)	The requirements of this rule are equivalent to the requirements of 40 CFR, 60, Subpart Kb.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

60.112b(a)(1)(i)	internal floating roof shall rest or float on the liquid surface at all times, except during initial fill, when empty or when emptied and refilled; when internal roof is resting on leg supports, filling, emptying and refilling shall be continuous and rapid
60.112b(a)(1)(ii)	each internal roof shall be equipped with one of the following: (A) liquid-mounted seal made up of a foam- or liquid-filled seal mounted in contact with the liquid, (B) two seals mounted one above the other so that each forms a continuous closure that completely cover the space

	between the wall of the storage vessel and the edge of the internal floating roof (lower seal may be vapor-mounted), or (C) mechanical shoe seal
60.112b(a)(1)(iii)	each opening in a noncontact internal floating roof (except for automatic bleeder vents, vacuum breaker vents, and the rim space vents) is to provide projection below the liquid surface
60.112b(a)(1)(iv)	each opening in the internal floating roof (except for leg sleeves, automatic bleeder and rim space vents, column, ladder and sample wells, and stub drains) is to be equipped with a cover or lid, equipped with a gasket, to be maintained closed at all times except when device is in use; covers on each access hatch and automatic gauge float well shall be bolted except when in use
60.112b(a)(1)(v)	automatic bleeder vents shall be equipped with a gasket and open only when internal floating roof is not floating or at the manufacturer's recommended setting
60.112b(a)(1)(vi)	rim space vents shall be equipped with a gasket and open only when the internal floating roof is not floating or at the manufacturer's recommended setting
60.112b(a)(1)(vii)	all sampling shall be done through the sampling well, equipped with a slit fabric cover that covers at least 90% of the opening
60.112b(a)(1)(viii)	each opening in the internal floating roof allowing for passage of a fixed-roof support column shall have a flexible fabric sleeve seal or a gasketed sliding cover
60.112b(a)(1)(ix)	each opening in the internal floating roof allowing for passage of a ladder shall have a gasketed sliding cover

(2) The total maximum annual throughput for T001-T004 units shall not exceed 438,438,000 gallons, as a rolling, 12-month summation.

a. To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the production levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (Gallons)
1	36,536,500
1-2	73,073,000
1-3	109,609,500
1-4	146,146,000
1-5	182,682,500
1-6	219,219,000
1-7	255,755,500
1-8	292,292,000
1-9	328,828,500
1-10	365,365,000
1-11	401,901,500
1-12	438,438,000

b. After the first 12 calendar months of operation, compliance with the annual limitation shall be based upon a rolling, 12-month summation of the monthly values.

d) Monitoring and/or Recordkeeping Requirements

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

60.113b(a)(1)	visual inspections and repair of holes, tears or other openings or defects in the internal floating roof, primary seal or seal fabric prior to filling storage vessel
60.113b(a)(2)	visual inspections of the internal floating roof and primary seal through manholes and roof hatches on the fixed-roof at least

	once every 12 months after initial fill; if the internal floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached or there are holes or tears in the seal fabric, storage vessel must be repaired or emptied and removed from service within 45 days; 30-day extension may be requested as required by 60.115b(a)(3)
60.113b(a)(4)	visual inspections each time the storage vessel is emptied or degassed and at least once every 10 years of the internal floating roof for defects, the primary seal and seal fabric for holes, tears or other openings, the gaskets for leaks, slotted membranes for more than 10% open area and sleeve seals and repair prior to fill refilling
60.115b(a)(2)	record of each inspection required pursuant to 60.113b(a)(1)-(4), including storage vessel identification, date inspection performed and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings)
60.116b	(a) 2 year records retention (b) records of each storage vessel dimension and capacity readily accessible (c) records of the VOL stored in each vessel, the period of storage and the maximum true vapor pressure (TVP) of that VOL during storage period

(2) The permitee shall maintain records of the following information for each fixed roof tank equipped with an internal floating roof.

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall maintain monthly records of the following information:

a. The total quantity of light crude oil throughput, in gallons;

b. The rolling, 12-month summation of light crude oil throughput, and for the first 12 calendar months of operation the cumulative total, in gallons;

c. The total quantity of VOC emissions; and

d. The rolling, 12-month summation of VOC emissions.

e) Reporting Requirements

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

60.7(a)(3) and 60.115b(a)(1)	notification of initial startup date and certification that control equipment meets specifications in 60.112b(a) and 60.113b(a) postmarked within 15 days
60.113b(a)(5)	30-day written notification prior to filling or refilling a storage vessel requiring a visual inspection per 60.113b(a)(1) and (4); immediate telephone and 7-day written notification prior to unplanned inspections or refilling
60.115b(a)(3)	report identifying any annual inspection that detects conditions described in 60.113b(a)(2), including storage vessel identification, nature of defects and date/nature of repair or date the storage vessel was emptied, within 30 days of inspection

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permitteeshall submit the PER in the form and manner provided by the director by the

due dateidentified in the Authorization section of this permit. The permit evaluation report shallcover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

(5) The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:

a. The rolling, 12-month and first 12 calendar months' cumulative light crude oil throughput limitations.

b. The rolling, 12-month VOC emissions limitation.

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. Emissions Limitation:

Total VOC emissions from T001-T004 shall not exceed 1.36 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the TPM emissions limitations shall be determined using records required by d)(2) and d)(3)and in accordance with the TANKS 4.0.9d program for uncontrolled losses from normal tank operations (maximum potential per the permittee's application), physical characteristics of the tank, crude oil properties and site-specific weather condition information provided in the permittee's application and the emissions estimation equations in AP-42 Section 7.1.3.2 (11/06). Compliance with the TPM emissions limitation shall be demonstrated by dividing the results of the following equations by 12 months per year:

Normal tank operations:

X = annual VOC emissions from T001-T004 for normal operations as calculated using the TANKS 4.0.9d program.

Roof landing episodes:

Y = annual VOC emissions from T001-T004 from roof landings as calculated using the following equation:

$$\sum_{i=1}^{N} L_{TL}$$

where:

N = number of roof landing episodes during the year; and

L_{TL} = total losses during roof landing, lb per landing episode as provided in the permittee's application;

Total VOC emissions:

VOC (tons per year) = X + Y

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.

3. T005 – T008, Tank #'s 5 - 8

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
T005	6,300,000 gallon (150,000 barrel) light crude oil fixed-roof storage tank with internal floating roofwith a combined annual throughput restriction of 438,438,000 gallons for T005-8.
T006	6,300,000 gallon (150,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T005-8.
T007	6,300,000 gallon (150,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T005-8.
T008	6,300,000 gallon (150,000 barrel) light crude oil fixed-roof storage tank with internal floating roof with a combined annual throughput restriction of 438,438,000 gallons for T005-8.

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. g)(1).

(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)(2), d)(2)-(3), and e)(5).

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) and OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 4.33 TPM, averaged over a rolling, 12-month period. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid TV)	VOC emissions shall not exceed 11.87 lbs/hr and 52.00 TPY, as a rolling, 12-

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month summation.
c.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b) [In accordance with 40 CFR 60.110b, this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.]	The permittee shall equip each storage vessel with a fixed roof in combination with an internal floating roof that meets the specifications of 40 CFR 60.112b(a)(1).
d.	40 CFR, Part 60, Subpart A [40 CFR 60.1 through 60.9]	General Provisions
e.	OAC rule 3745-21-09(L)	The requirements of this rule are equivalent to the requirements of 40 CFR, 60, Subpart Kb.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

60.112b(a)(1)(i)	internal floating roof shall rest or float on the liquid surface at all times, except during initial fill, when empty or when emptied and refilled; when internal roof is resting on leg supports, filling, emptying and refilling shall be continuous and rapid
60.112b(a)(1)(ii)	each internal roof shall be equipped with one of the following: (A) liquid-mounted seal made up of a foam- or liquid-filled seal mounted in contact with the liquid, (B) two seals mounted one above the other so that each forms a continuous closure that completely cover the space

	between the wall of the storage vessel and the edge of the internal floating roof (lower seal may be vapor-mounted), or (C) mechanical shoe seal
60.112b(a)(1)(iii)	each opening in a noncontact internal floating roof (except for automatic bleeder vents, vacuum breaker vents, and the rim space vents) is to provide projection below the liquid surface
60.112b(a)(1)(iv)	each opening in the internal floating roof (except for leg sleeves, automatic bleeder and rim space vents, column, ladder and sample wells, and stub drains) is to be equipped with a cover or lid, equipped with a gasket, to be maintained closed at all times except when device is in use; covers on each access hatch and automatic gauge float well shall be bolted except when in use
60.112b(a)(1)(v)	automatic bleeder vents shall be equipped with a gasket and open only when internal floating roof is not floating or at the manufacturer's recommended setting
60.112b(a)(1)(vi)	rim space vents shall be equipped with a gasket and open only when the internal floating roof is not floating or at the manufacturer's recommended setting
60.112b(a)(1)(vii)	all sampling shall be done through the sampling well, equipped with a slit fabric cover that covers at least 90% of the opening
60.112b(a)(1)(viii)	each opening in the internal floating roof allowing for passage of a fixed-roof support column shall have a flexible fabric sleeve seal or a gasketed sliding cover
60.112b(a)(1)(ix)	each opening in the internal floating roof allowing for passage of a ladder shall have a gasketed sliding cover

(2) The total maximum annual throughput for T005-T008 unit shall not exceed 438,438,000 gallons, as a rolling, 12-month summation.

a. To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the production levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (Gallons)
1	36,536,500
1-2	73,073,000
1-3	109,609,500
1-4	146,146,000
1-5	182,682,500
1-6	219,219,000
1-7	255,755,500
1-8	292,292,000
1-9	328,828,500
1-10	365,365,000
1-11	401,901,500
1-12	438,438,000

b. After the first 12 calendar months of operation, compliance with the annual limitation shall be based upon a rolling, 12-month summation of the monthly values.

d) Monitoring and/or Recordkeeping Requirements

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

60.113b(a)(1)	visual inspections and repair of holes, tears or other openings or defects in the internal floating roof, primary seal or seal fabric prior to filling storage vessel
60.113b(a)(2)	visual inspections of the internal floating roof and primary seal through manholes and roof hatches on the fixed-roof at least

	once every 12 months after initial fill; if the internal floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached or there are holes or tears in the seal fabric, storage vessel must be repaired or emptied and removed from service within 45 days; 30-day extension may be requested as required by 60.115b(a)(3)
60.113b(a)(4)	visual inspections each time the storage vessel is emptied or degassed and at least once every 10 years of the internal floating roof for defects, the primary seal and seal fabric for holes, tears or other openings, the gaskets for leaks, slotted membranes for more than 10% open area and sleeve seals and repair prior to fill refilling
60.115b(a)(2)	record of each inspection required pursuant to 60.113b(a)(1)-(4), including storage vessel identification, date inspection performed and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings)
60.116b	(a) 2 year records retention (b) records of each storage vessel dimension and capacity readily accessible (c) records of the VOL stored in each vessel, the period of storage and the maximum true vapor pressure (TVP) of that VOL during storage period

(2) The permitee shall maintain records of the following information for each fixed roof tank equipped with an internal floating roof.

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall maintain monthly records of the following information:

a. The total quantity of light crude oil throughput, in gallons;

b. The rolling, 12-month summation of light crude oil throughput, and for the first 12 calendar months of operation, the cumulative total, in gallons;

c. The total quantity of VOC emissions; and

d. The rolling, 12-month summation of VOC emissions.

e) Reporting Requirements

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

60.7(a)(3) and 60.115b(a)(1)	notification of initial startup date and certification that control equipment meets specifications in 60.112b(a) and 60.113b(a) postmarked within 15 days
60.113b(a)(5)	30-day written notification prior to filling or refilling a storage vessel requiring a visual inspection per 60.113b(a)(1) and (4); immediate telephone and 7-day written notification prior to unplanned inspections or refilling
60.115b(a)(3)	report identifying any annual inspection that detects conditions described in 60.113b(a)(2), including storage vessel identification, nature of defects and date/nature of repair or date the storage vessel was emptied, within 30 days of inspection

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permitteeshall submit the PER in the form and manner provided by the director by the

due dateidentified in the Authorization section of this permit. The permit evaluation report shallcover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

(5) The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:

a. The rolling, 12-month and first 12 calendar months' cumulative light crude oil throughput limitations.

b. The rolling, 12-month VOC emissions limitation.

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. Emissions Limitation:

Total VOC emissions from T005-T008 shall not exceed 51.98 TPY and 4.33 TPM, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual and TPM emissions limitations shall be determined using records required by d)(2) and d)(3)and in accordance with the TANKS 4.0.9d program for uncontrolled losses from normal tank operations (maximum potential per the permittee's application), physical characteristics of the tank, crude oil properties and site-specific weather condition information provided in the permittee's application and the emissions estimation equations in AP-42 Section 7.1.3.2 (11/06). Compliance with the TPM emissions limitation shall be demonstrated by dividing the results of the following equations by 12 months per year:

Normal tank operations:

X = annual VOC emissions from T005-T008 for normal operations as calculated using the TANKS 4.0.9d program.

Roof landing episodes:

Y = annual VOC emissions from T005-T008 from roof landings as calculated using the following equation:

$$\sum_{i=1}^{N} L_{TL}$$

where:

N = number of roof landing episodes during the year; and

L_{TL} = total losses during roof landing, lb per landing episode as provided in the permittee's application.

Total VOC emissions:

VOC (tons per year) = X + Y

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.