



11/21/2014

Drew Johnson  
 Midwest Terminals - Utica, LLC  
 383 W. Dussel Drive  
 Maumee, OH 43537

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0634005064  
 Permit Number: P0116758  
 Permit Type: Initial Installation  
 County: Harrison

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

## **How to save money, reduce pollution and reduce energy consumption**

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

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 or 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: U.S. EPA  
Ohio EPA-SEDO; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Midwest Terminals - Utica, LLC**

Facility ID:	0634005064
Permit Number:	P0116758
Permit Type:	Initial Installation
Issued:	11/21/2014
Effective:	11/21/2014





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Midwest Terminals - Utica, LLC

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**Final Permit-to-Install**  
Midwest Terminals - Utica, LLC  
**Permit Number:** P0116758  
**Facility ID:** 0634005064  
**Effective Date:** 11/21/2014

## Authorization

Facility ID: 0634005064  
Facility Description: Stabilized Condensate Transloading Terminal  
Application Number(s): A0048393, A0051449  
Permit Number: P0116758  
Permit Description: Initial PTI for a stabilized condensate storage and railcar transfer terminal located in Cadiz, Harrison County.  
Permit Type: Initial Installation  
Permit Fee: \$3,850.00  
Issue Date: 11/21/2014  
Effective Date: 11/21/2014

This document constitutes issuance to:

Midwest Terminals - Utica, LLC  
Toot Rd  
Cadiz, OH 43907

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

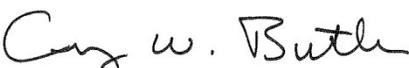
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0116758  
Permit Description: Initial PTI for a stabilized condensate storage and railcar transfer terminal located in Cadiz, Harrison County.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	UnpavedRoads
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	Railcar Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J002</b>
Company Equipment ID:	Truck Loading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Flare
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	2 - 500,000 bbl ASTs
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Midwest Terminals - Utica, LLC  
**Permit Number:** P0116758  
**Facility ID:** 0634005064  
**Effective Date:** 11/21/2014

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



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) 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 appropriate Ohio EPA District Office or contracted



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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

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

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
Midwest Terminals - Utica, LLC  
**Permit Number:** P0116758  
**Facility ID:** 0634005064  
**Effective Date:** 11/21/2014

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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following emission unit contained in this permit is subject to 40 CFR Part 60, Subparts A and Kb: T002. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office of local air agency.
3. Midwest Terminals—Utica, LLC (Facility ID: 0634005064) and Utica Condensation Stabilization Facility (Facility ID: 0634005057) have been determined to be one facility for permitting purposes under 40 CFR Part 52.21, OAC Chapter 3745-31, and OAC Chapter 3745-77.
4. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions units' maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01 and taking into account Ohio EPA Engineering Guides #69 and #70, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.



**Final Permit-to-Install**  
Midwest Terminals - Utica, LLC  
**Permit Number:** P0116758  
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## **C. Emissions Unit Terms and Conditions**



**1. F001, Unpaved Roads and Parking**

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

Facility unpaved roadways and parking areas with a maximum of 3,693 vehicle miles traveled per year.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	See b)(2)b. below.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than ten tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. This rule paragraph applies once U.S. EPA approves the OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than ten tons per year BAT exemption) as part of the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the potential to emit is less than 10 tons/yr.

c. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or



watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- f. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of paved surface due to application of certain types of dust suppressants, may be controlled with the control measure specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emissions limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emissions limitation of no VEs except for one minute during any 60-minute period.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each segment of roadway or parking area for which the plan applies.



- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
  - i. Roadway or parking area segment inspected;
  - ii. Date inspected;
  - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
  - iv. Result of the inspection (needs treated or does not need treated);
  - v. A description of why no treatment was needed;
  - vi. Date treated;
  - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
  - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or local air agency (DO/Laa) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/Laa has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.



(3) Work Practice Plan Recordkeeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.
- c. The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/Laa.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit semi-annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the semi-annual monitoring, recordkeeping, and reporting requirements deviation reports required in the Standard Terms and Conditions section of this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



**2. J001, Railcar Loading Rack**

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

Top load, fully submerged rail car loading rack used for the transfer of stabilized condensate consisting of two bays, each with five loading arms with emissions routed to a flare (P002) with 95% control efficiency and 100% capture efficiency of VOC emissions, and a maximum annual throughput of 873,810,000 gallons taking into account a 95% maximum utilization rate.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Volatile organic compound (VOC) emissions from stabilized condensate railcar loading losses and truck loading losses combined shall not exceed 88.69 tons per year.  Use of submerged fill on all railcars.  See c)(1) through c)(4) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Emissions from the loading of railcars with stabilized condensate shall be vented to a flare(P002) with a minimum of 100% capture efficiency and 95% control efficiency for VOC emissions.

(2) All stabilized condensate loading lines shall be equipped with fittings which are vapor tight.

(3) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.



- (4) The permittee shall not permit stabilized condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
  - (5) Due to inherent limitations associated with the loading operations of J001 and J002, at no time shall both the 350 gpm pump and the 6,500 gpm pump be in operation simultaneously.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following each month:
    - a. the amount of throughput of stabilized condensate for J001 and J002 separately, in gallons;
    - b. the monthly VOC emissions as calculated in section f)(1)a., in tons; and
    - c. operating times when both the 350 gpm and 6,500 gpm pump were operating simultaneously.
- e) **Reporting Requirements**
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit deviation (excursion) reports that identify each day when both the 350 gpm and the 6,500 gpm pump were in operation simultaneously. Each report shall be submitted within 30 days after the deviation occurs.
  - (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. **Emissions Limitation:**

VOC emissions from stabilized condensate railcar loading losses and truck loading losses shall not exceed 88.69 tons per year.

**Applicable Compliance Method:**

The annual emissions limitation was determined based on worst case scenario operation using the following calculations, taking into account that the allowable was based on a maximum annual throughput of 919,800,000 gallons for railcar loading.



**Stabilized condensate railcar loading loss:**

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

$$L_L = 12.46 \times (\text{SPM}/T)$$

Where:

S = saturation factor = 0.6 unit less for submerged loading, based on AP-42 Chapter 5.2-1

P = true vapor pressure = 4.2 psia, based on product information

M = molecular weight of vapors = 66 lb/lb-mole, based on product information

T = temperature of bulk liquid = 509.67 °R, based on engineering estimate

Maximum condensate throughput = as recorded in d)(1)a. above

Maximum utilization rate = 95%, based on permittee's application

1.0 = capture efficiency of system in decimal form, based on permittee's application

0.95 = destruction/control efficiency of flare in decimal form, based on permittee's application

$$L_L = 12.46 \times [(0.6)(4.2)(66)]/509.67 = 4.06 \text{ lbs} / 1,000 \text{ gal of liquid loaded}$$

Annual uncontrolled emissions rate = stabilized condensate loading loss X (maximum condensate throughput x 95% maximum utilization rate) = 4.06 lb/1,000 gal X (annual throughput in gallons x 0.95) / (2,000 lbs/ 1 ton) = tons/year uncontrolled VOC

Annual controlled emissions rate = tons/year uncontrolled VOC x (capture efficiency) x (1 - control efficiency) = (tons/year emissions based on annual throughput calculation)(1.0)(1-0.95) = tons of VOC/year controlled

**Stabilized condensate truck loading loss:**

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

$$L_L = 12.46 \times (\text{SPM}/T)$$

Where:

S = saturation factor = 0.6 unit less for submerged loading (AP-42 Chapter 5.2-1)

P = true vapor pressure = 4.2 psia, based on product information

M = molecular weight of vapors = 66 lb/lb-mole, based on product information

T = temperature of bulk liquid = 509.67 °R, based on engineering estimate

Maximum condensate throughput = as recorded in d)(1)a. above

Maximum utilization rate = 95%, based on permittee's application



1.0 = capture efficiency of system in decimal form, based on permittee's application

0.95 = destruction/control efficiency of flare in decimal form, based on permittee's application

$$L_L = 12.46 \times [(0.6)(4.2)(66)]/509.67 = 4.06 \text{ lbs / 1,000 gal of liquid loaded}$$

Annual uncontrolled emissions rate = stabilized condensate loading loss X (maximum condensate throughput x 95% maximum utilization rate) = 4.06 lb/1,000 gal X (annual throughput in gallons x 0.95) / (2,000 lbs/ 1 ton) = tons/year uncontrolled VOC

Annual controlled emissions rate = tons/year uncontrolled VOC x (capture efficiency) x (1 - control efficiency) = (tons/year emissions based on annual throughput calculation)(1.0)(1-0.95) = tons of VOC/year controlled

Total J001 and J002 Emissions Combined:

(J001 tons of VOC/year controlled) + (J002 tons of VOC/year controlled) ≥ **88.69 tons of VOC/year controlled**

g) Miscellaneous Requirements

(1) None.



**3. J002, Truck Loading**

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

Top/bottom load, fully submerged truck loading rack used for the transfer of stabilized condensate consisting of two bays, each with one loading arm with emissions routed to a flare (P002) with 95% control efficiency and 100% capture efficiency for VOC emissions, and a maximum annual throughput of 124,830,000 gallons taking into account a 95% maximum utilization rate.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Volatile organic compound (VOC) emissions from stabilized condensate railcar loading losses and truck loading losses combined shall not exceed 88.69 tons per year.  Use of submerged fill on all trucks.  See c)(1) through c)(4) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Emissions from the loading of trucks with stabilized condensate shall be vented to a flare (P002) with a minimum of 100% capture efficiency and 95% control efficiency for VOC emissions.

(2) All stabilized condensate loading lines shall be equipped with fittings which are vapor tight.



- (3) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
  - (4) The permittee shall not permit stabilized condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
  - (5) Due to inherent limitations associated with the loading operations of J001 and J002, at no time shall both the 350 gpm pump and the 6,500 gpm pump be in operation simultaneously.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following each month:
    - a. the amount of throughput of stabilized condensate for J001 and J002 separately, in gallons;
    - b. the monthly VOC emissions as calculated in section f)(1)a., in tons; and
    - c. operating times when both the 350 gpm and 6,500 gpm pump were operating simultaneously.
- e) **Reporting Requirements**
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit deviation (excursion) reports that identify each day when both the 350 gpm and the 6,500 gpm pump were in operation simultaneously. Each report shall be submitted within 30 days after the deviation occurs.
  - (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emissions Limitation:

VOC emissions from stabilized condensate railcar loading losses and truck loading losses combined shall not exceed 88.69 tons per year.

Applicable Compliance Method:

The annual emissions limitation was determined based on worst case scenario operation using the following calculations, taking into account that the allowable



was based on a maximum annual throughput of 919,800,000 gallons for railcar loading.

**Stabilized condensate railcar loading loss:**

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

$$L_L = 12.46 \times (\text{SPM}/T)$$

Where:

S = saturation factor = 0.6 unit less for submerged loading, based on AP-42 Chapter 5.2-1

P = true vapor pressure = 4.2 psia, based on product information

M = molecular weight of vapors = 66 lb/lb-mole, based on product information

T = temperature of bulk liquid = 509.67 °R, based on engineering estimate

Maximum condensate throughput = as recorded in d)(1)a. above

Maximum utilization rate = 95%, based on permittee's application

1.0 = capture efficiency of system in decimal form, based on permittee's application

0.95 = destruction/control efficiency of flare in decimal form, based on permittee's application

$$L_L = 12.46 \times [(0.6)(4.2)(66)]/509.67 = 4.06 \text{ lbs} / 1,000 \text{ gal of liquid loaded}$$

Annual uncontrolled emissions rate = stabilized condensate loading loss X (maximum condensate throughput x 95% maximum utilization rate) = 4.06 lb/1,000 gal X (annual throughput in gallons x 0.95) / (2,000 lbs/ 1 ton) = tons/year uncontrolled VOC

Annual controlled emissions rate = tons/year uncontrolled VOC x (capture efficiency) x (1 - control efficiency) = (tons/year emissions based on annual throughput calculation)(1.0)(1-0.95) = tons of VOC/year controlled

**Stabilized condensate truck loading loss:**

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

$$L_L = 12.46 \times (\text{SPM}/T)$$

Where:

S = saturation factor = 0.6 unit less for submerged loading (AP-42 Chapter 5.2-1)

P = true vapor pressure = 4.2 psia, based on product information

M = molecular weight of vapors = 66 lb/lb-mole, based on product information

T = temperature of bulk liquid = 509.67 °R, based on engineering estimate

Maximum condensate throughput = as recorded in d)(1)a. above



Maximum utilization rate = 95%, based on permittee's application

1.0 = capture efficiency of system in decimal form, based on permittee's application

0.95 = destruction/control efficiency of flare in decimal form, based on permittee's application

$L_L = 12.46 \times [(0.6)(4.2)(66)]/509.67 = 4.06 \text{ lbs} / 1,000 \text{ gal of liquid loaded}$

Annual uncontrolled emissions rate = stabilized condensate loading loss X (maximum condensate throughput x 95% maximum utilization rate) = 4.06 lb/1,000 gal X (annual throughput in gallons x 0.95) / (2,000 lbs/ 1 ton) = tons/year uncontrolled VOC

Annual controlled emissions rate = tons/year uncontrolled VOC x (capture efficiency) x (1 - control efficiency) = (tons/year emissions based on annual throughput calculation)(1.0)(1-0.95) = tons of VOC/year controlled

Total J001 and J002 Emissions Combined:

(J001 tons of VOC/year controlled) + (J002 tons of VOC/year controlled) ≥ **88.69 tons of VOC/year controlled**

g) Miscellaneous Requirements

(1) None.



**4. P002, Incineration Flare**

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

Air-assisted open incineration Hero flare rated at 99.9 MMBtu/hr used for control of VOC emissions from railcar and truck loading operations with a 100% capture and a 95% destruction efficiency of VOC emissions. Pilot flame will be present 8,760 hours/year and supplemental fuel will be available for a maximum of 1,000 hours per year in order to achieve a minimum flare fuel combustion value of 300 MMBtu.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	<p>Total carbon monoxide (CO) emissions from the pilot gas, supplemental gas, and flared gas combined shall not exceed 11.51 lbs/hr and 50.09 tons per year.</p> <p>Total nitrogen oxide (NOx) emissions from the pilot gas, supplemental gas, and flared gas combined shall not exceed 5.00 lb/hr and 21.09 tons per year.</p> <p>See c)(1) through c)(3) below.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

(2) The flare shall be designed and operated as follows:

a. The flare shall be operated with a minimum of 100% capture and a 95% control efficiency of VOC; and



- b. The flare shall be operated at all times when emission units J001 or J002 is in operation for the purpose of controlling VOC emissions from these operations.
  - (3) Due to inherent operational parameters, supplemental fuel shall be available in order to achieve a minimum flare fuel combustion value of 300 MMBtu for a maximum of 1,000 hours per year.
- d) **Monitoring and/or Recordkeeping Requirements**
  - (1) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.
  - (2) The permittee shall properly install, operate, and maintain a pressure sensor and flame detection device to monitor the need for a flame and presence of a flame, respectively, when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
  - (3) The permittee shall record the following information each day for the flare and process operations:
    - a. all periods during which the pressure sensor and/or flame detection device were not functioning properly;
    - b. the operating times for the flare and monitoring equipment; and
    - c. the hours supplemental fuel was used.
- e) **Reporting Requirements**
  - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
  - (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) **Testing Requirements**
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. **Emissions Limitation:**

Total CO emissions from the pilot gas, supplemental gas, and flared gas shall not exceed 11.51 lb/hr and 50.09 tons per year.



Applicable Compliance Method:

The annual emissions limitation was established based on the following calculations:

Pilot gas emissions

$(\text{heat value of pilot fuel})(\text{CO emissions factor lbs/mmbtu}) = \text{lbs/hr CO emissions}$

$(\text{lb/hr CO emissions} \times \text{maximum hours of operation/yr}) = \text{tons/yr CO emissions}$

Where:

Supplemental fuel flow = 78scfh @ 7 PSIG, based on engineering design

Heat value of pilot fuel = 0.1638mmbtu/hr, based on permittee's application

Maximum hours of operation = 8,760 hours/year

CO emissions factor: 0.08230 lbs/mmbtu, based on AP-42 Emission Factors for Natural Gas Combustion

Therefore:

$(0.1638\text{mmbtu/hr} \times 0.08230 \text{ lbs/mmbtu}) = 0.01 \text{ lb/hr CO}$

$(0.01 \times 8,760 \text{ hrs/yr}) / (2,000 \text{ lbs/ton}) = 0.06 \text{ tons/yr CO}$

Supplemental gas emissions:

$(\text{heat value of supplemental fuel})(\text{CO emissions factor lbs/mmbtu}) = \text{lbs/hr CO emissions}$

$(\text{lb/hr CO emissions} \times \text{maximum hours of operation/yr}) = \text{tons/yr CO emissions}$

Where:

Supplemental fuel flow = 1,053.07 scfh @ 7 PSIG, 43% of 2,449.00 scfh average loading rate

Heat value of supplemental fuel = 1,050.00 btu/scf, based on permittee's application

Heat value of supplemental fuel = 1.1057 mmbtu/hr

Maximum hours of operation = 1,000.00, based on engineering estimate using industry precedence

CO emissions factor: 0.08230 lbs/mmbtu, based on AP-42 Emission Factors for Natural Gas Combustion



Therefore:

$$(1.1057 \text{ mmbtu/hr} \times 0.08230 \text{ lbs/mmbtu}) = 0.09 \text{ lb/hr CO}$$

$$(0.09 \times 1,000 \text{ hrs/yr}) / (2,000 \text{ lbs/ton}) = 0.05 \text{ tons/yr CO}$$

Flared gas emissions:

$$(\text{liters/hr}) \times (\text{flare CO emission factor g/liter}) = \text{total grams CO/hr}$$

$$(\text{total grams CO/hr}) \times (0.00220426 \text{ lbs/gram}) = \text{total lbs CO/hr}$$

$$[(\text{total lbs CO/hr}) \times (8,760 \text{ hours / year})] / (2,000 \text{ lbs/ton}) = \text{total tons CO/ year}$$

Where:

Flare CO emission factor = 0.012 g/liter condensate loaded, based on engineering estimate and manufacturer performance estimates

Bbl/day = 65,142.86 bbl/day, based on 95% maximum utilization of truck and railcar loading (see J001 and J002)

$$\text{Bbl/year} = 23,777,142.86 \text{ bbl/year}$$

$$\text{Gallons/day} = 2,736,000 \text{ gal/day}$$

$$\text{Liters/day} = 10,356,881.76 \text{ liters/day}$$

$$\text{Liters/hour} = 431,536.74 \text{ liters/hour}$$

Therefore:

$$(431,536.74 \text{ liters/hr}) \times (0.012 \text{ g/liter}) = 5,178.44 \text{ grams CO/hr}$$

$$(5,178.44 \text{ grams CO/hr}) \times (0.00220426 \text{ lbs/gram}) = 11.41 \text{ lbs CO/hr}$$

$$[(11.41 \text{ lbs CO/hr} \times 8,760 \text{ hours/year}) / (2,000 \text{ lbs/ton})] = 49.98 \text{ tons CO/ year}$$

Total CO emissions:

$$0.01 \text{ lb/hr} + 0.09 \text{ lb/hr} + 11.41 \text{ lb/hr} = \mathbf{11.51 \text{ lb/hr CO}}$$

$$0.06 \text{ ton/year} + 0.05 \text{ ton/year} + 49.98 \text{ tons/year} = \mathbf{50.09 \text{ tons/year CO}}$$

b. Emissions Limitations:

Total NO<sub>x</sub> emissions from the pilot gas, supplemental gas, and flared gas shall not exceed 5.00 lb/hr and 21.09 tons per year.



Applicable Compliance Method:

The emissions limitations were established based on the following calculations:

Pilot gas emissions:

(heat value of pilot fuel)(NO<sub>x</sub> emissions factor lbs/mmbtu) = lbs/hrNO<sub>x</sub> emissions

(lb/hrNO<sub>x</sub> emissions x maximum hours of operation/yr) = tons/yrNO<sub>x</sub> emissions

Where:

Supplemental fuel flow = 78 scfh @ 7 PSIG, based on engineering design

Heat value of supplemental fuel = 0.1638 mmbtu/hr

Maximum hours of operation = 8,760 hours/year

NO<sub>x</sub> emissions factor: 0.18627 lbs/mmbtu, based on AP-42 Emission Factors for Natural Gas Combustion

Therefore:

(0.1638 mmbtu/hr x 0.18627 lbs/mmbtu) = 0.03 lb/hrNO<sub>x</sub>

(0.03 x 8,760 hrs/yr) / (2,000 lbs/ton) = 0.13 tons/yrNO<sub>x</sub>

Supplemental gas emissions:

(heat value of supplemental fuel)(CO emissions factor lbs/mmbtu) = lbs/hr CO emissions

(lb/hr CO emissions x maximum hours of operation/yr) = tons/yr CO emissions

Where:

Supplemental fuel flow = 1,053.07 scfh @ 7 PSIG, 43% of 2,449.00 scfh average loading rate

Heat value of supplemental fuel = 1,050.00 btu/scf

Heat value of supplemental fuel = 1.1057 mmbtu/hr

Maximum hours of operation = 1,000.00, based on engineering estimate using industry precedence

NO<sub>x</sub> emissions factor: 0.18627 lbs/mmbtu, based on AP-42 Emission Factors for Natural Gas Combustion

Therefore:

(1.1057 mmbtu/hr x 0.18627 lbs/mmbtu) = 0.21 lb/hrNO<sub>x</sub>



$$(0.21 \times 1,000 \text{ hrs/yr}) / (2,000 \text{ lbs/ton}) = 0.11 \text{ tons/yrNO}_x$$

Flared gas emissions:

$$(\text{liters/hr}) \times (\text{flare NO}_x \text{ emission factor g/liter}) = \text{total grams NO}_x/\text{hr}$$

$$(\text{total grams NO}_x/\text{hr}) \times (0.00220426 \text{ lbs/gram}) = \text{total lbsNO}_x/\text{hr}$$

$$[(\text{total lbsNO}_x/\text{hr}) \times (8,760 \text{ days/ year})] / (2,000 \text{ lbs/ton}) = \text{total tons NO}_x/\text{ year}$$

Where:

Flare NO<sub>x</sub> emission factor = 0.005 g/liter condensate loaded, based on engineering estimate and manufacturer performance estimates

Bbl/day = 65,142.86 bbl/day, based on 95% maximum utilization of truck and railcar loading (see J001 and J002)

$$\text{Bbl/year} = 23,777,142.86 \text{ bbl/year}$$

$$\text{Gallons/day} = 2,736,000 \text{ gal/day}$$

$$\text{Liters/day} = 10,356,881.76 \text{ liters/day}$$

$$\text{Liters/hour} = 431,536.74 \text{ liters/hour}$$

Therefore:

$$(431,536.74 \text{ liters/hr}) \times (0.005 \text{ g/liter}) = 2,157.68 \text{ grams NO}_x/\text{day}$$

$$(2,157.68 \text{ grams NO}_x/\text{hr}) \times (0.00220426 \text{ lbs/gram}) = 4.76 \text{ lbsNO}_x/\text{hr}$$

$$[(4.76 \text{ lbsNO}_x/\text{hr} \times 8,760 \text{ hrs/year}) / (2,000 \text{ lbs/ton})] = 20.85 \text{ tons NO}_x / \text{ year}$$

Total NO<sub>x</sub> emissions:

$$0.03 \text{ lb/hr} + 0.21 \text{ lb/hr} + 4.76 \text{ lbs/hr} = \mathbf{5.00 \text{ lbs/hrNO}_x}$$

$$0.13 \text{ ton/yr} + 0.11 \text{ ton/year} + 20.85 \text{ tons/year} = \mathbf{21.09 \text{ ton/year NO}_x}$$

g) Miscellaneous Requirements

- (1) None.



**5. T002, 2 - 50,000 bbl ASTs**

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

Two internal floating roof 50,000 bbl above-ground stabilized condensate storage tanks

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Total volatile organic compound (VOC) emissions from all condensate tanks shall not exceed 5.60 tons per year.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	See b)(2)b. below.
c.	OAC rule 3745-21-09(L)	See b)(2)c. through b)(2)e.
d.	40 CFR Part 60, Subpart Kb (60.110b – 60.117b)	See b)(2)f. and b)(2)g. below.
e.	40 CFR Part 60, Subpart A (60.1-60.19)	See b)(2)h. below.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than ten tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. This rule paragraph applies once U.S. EPA approves the OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than ten tons per year BAT exemption) as part of the Ohio SIP.



The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from this air contaminant source since the potential to emit is less than 10 tons/yr.

- c. The fixed roof storage tank shall be equipped with an internal floating roof.
- d. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- e. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- f. 40 CFR Part 60, Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- g. The fixed roof tank shall be equipped with an internal floating roof meeting the specifications identified in 40 CFR 60.112(a)(1).
- h. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) See 40 CFR Part 60, Subpart Kb (40 CFR 60.11b – 60.117b).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information:
  - a. the type of material being stored in the tank; and
  - b. the amount of material throughput for this emissions unit, in gallons.
- (2) The permittee shall record the annual throughput of each tank in gallons per year. The permittee shall keep records of U.S. EPA Tanks software program and/or other process simulation program calculations used to demonstrate annual storage tank and process vent emissions. These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (3) Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);



- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and,
- d. date of performance testing (if required, at least 30 days prior to testing).

Unless other arrangements have been approved by the Director, all reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (4) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b).

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) If a material other than stabilized condensate is stored in this emissions unit, the permittee shall notify the Ohio EPA no more than 30 days after which the event occurred.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b).

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. Compliance Limitation:

Total VOC emissions from all condensate tanks shall not exceed and 5.60 tons per year.

Applicable Compliance Methods:

Compliance with the above emissions limitation shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; either the TANKS software program or other process simulation programs such as, but not limited to, HYSYS or ProMax, to calculate flash losses; the Gas Research Institute's simulation program GLY Calc version 4 or equivalent to calculate flash tank off-gas emissions; and an assumed destruction efficiency of 98% for the flare as presented in the application.



**Final Permit-to-Install**  
Midwest Terminals - Utica, LLC  
**Permit Number:** P0116758  
**Facility ID:** 0634005064  
**Effective Date:** 11/21/2014

- b. See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b).
- g) Miscellaneous Requirements
  - (1) Any amendment to 40 CFR Part 60, Subpart Kb shall supersede the compliance limitations and/or options contained in this permit.