



12/30/2014

Certified Mail

Steve Clark
Ergon Trucking, Inc.- Marietta
PO BOX 1639
JACKSON, MS 39215-1639

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0684020225
Permit Number: P0117952
Permit Type: Initial Installation
County: Washington

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)385-8501 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: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ergon Trucking, Inc.- Marietta**

Facility ID:	0684020225
Permit Number:	P0117952
Permit Type:	Initial Installation
Issued:	12/30/2014
Effective:	12/30/2014
Expiration:	7/14/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Ergon Trucking, Inc.- Marietta

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Final Permit-to-Install and Operate
Ergon Trucking, Inc.- Marietta
Permit Number: P0117952
Facility ID: 0684020225
Effective Date: 12/30/2014

Authorization

Facility ID: 0684020225
Application Number(s): A0051968
Permit Number: P0117952
Permit Description: Initial PTIO for one 55,000-barrel storage tank and one maintenance flare at an existing crude oil transloading facility
Permit Type: Initial Installation
Permit Fee: \$1,750.00
Issue Date: 12/30/2014
Effective Date: 12/30/2014
Expiration Date: 7/14/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Ergon Trucking, Inc.- Marietta
35020 State Rte 7
Newport, OH 45768-5236

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

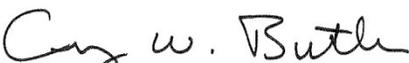
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Final Permit-to-Install and Operate
Ergon Trucking, Inc.- Marietta
Permit Number: P0117952
Facility ID: 0684020225
Effective Date: 12/30/2014

Authorization (continued)

Permit Number: P0117952

Permit Description: Initial PTIO for one 55,000-barrel storage tank and one maintenance flare at an existing crude oil transloading facility

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

Emissions Unit ID:	P001
Company Equipment ID:	MAINTFLARE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	Tank 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Ergon Trucking, Inc.- Marietta
Permit Number: P0117952
Facility ID: 0684020225
Effective Date: 12/30/2014

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



Final Permit-to-Install and Operate
Ergon Trucking, Inc.- Marietta
Permit Number: P0117952
Facility ID: 0684020225
Effective Date: 12/30/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Ergon Trucking, Inc.- Marietta

Permit Number: P0117952

Facility ID: 0684020225

Effective Date: 12/30/2014

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.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart Kb: T007. The complete NSPS requirements, including the 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 or local air agency.
3. Any waste generated by the permittee must be evaluated per OAC rule 3745-52-11 to determine if it is a hazardous waste. All waste determined to be hazardous waste must be managed in accordance with federal and state hazardous waste laws and rules.



Final Permit-to-Install and Operate
Ergon Trucking, Inc.- Marietta
Permit Number: P0117952
Facility ID: 0684020225
Effective Date: 12/30/2014

C. Emissions Unit Terms and Conditions



1. P001, Maintenance Flare

Operations, Property and/or Equipment Description:

VOC emissions from maintenance activities controlled with a 145.83 million BTU/hr air-assisted elevated open flare with 100% capture efficiency and 98% control efficiency equipped with a 0.08 million BTU/hr pilot burner; maximum waste gas throughput of 0.52 million scf/yr and maximum natural gas pilot fuel throughput of 0.68 million scf/yr

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. 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)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.72 ton per year.</p> <p>See c)(1)-(5) below.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Carbon monoxide (CO) emissions shall not exceed 0.03 ton per month averaged over a twelve month rolling period.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.02 ton per month averaged over a twelve month rolling period.</p> <p>See b)(2)a. below.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	The Best Available Technology (BAT) requirements under OAC rule 3745-31-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(A)(3) do not apply to the CO and SO ₂ emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) As the flare is used for periodic maintenance, an inherent operational limitation of 10 hours per year has been established for the flaring of VOC emissions from maintenance activities.
- (2) The permittee shall vent 100% of the waste gas generated during maintenance activities to the flare with a minimum 98% control efficiency.
- (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 record the total number of hours per calendar year during which maintenance activities were performed.
- (2) For each occurrence during which maintenance activities are performed when 100% of the waste gas was not captured and routed to the flare, or when 98% control efficiency of the flare was not maintained, the permittee shall maintain a record of the quantity of waste gas that was generated and not captured and vented to the flare and the actual control efficiency achieved.
- (3) 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 waste gas was being vented to the flare; and
 - c. record all periods of time during which waste gas was being vented to the flare and there was no flame present.

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) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each time that maintenance activities are performed when 100% of the waste gas was not captured and routed to the flare, each time a minimum of 98% control efficiency was not maintained for the flare, and all periods of time when the pilot flame or electronic arc ignition system is not working or there was no flame present when waste gas was being vented to it. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

VOC emissions shall not exceed 0.72 ton per year.

Applicable Compliance Method:



Compliance with the VOC emissions limitation is demonstrated by the following calculations as presented in the permittee's application:

VOC (tons per year)

$$\begin{aligned}
 &= [(VOC \text{ emissions factor for natural gas fuel, in lb/million scf} \times \text{maximum hourly natural gas input to pilot, in scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (\text{maximum hourly waste gas input to flare, in lbs/hr} \times \text{control efficiency for VOC, in percent by weight} \times \text{number of maintenance events/yr}) + (VOC \text{ emissions factor for natural gas, in lb/million scf} \times \text{maximum hourly waste gas input to the flare, in scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times \text{number of maintenance events/yr})] \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= [(5.5 \text{ lbs VOC/million scf} \times 78 \text{ scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (7,198 \text{ lbs/hr} \times (1-0.98) \times 10) + (5.5 \text{ lbs VOC/million scf} \times 52,083 \text{ scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 10)] \times 1 \text{ ton}/2,000 \text{ lbs} \\
 &= [3.76 \text{ lbs/yr} + 1,439.6 \text{ lbs/yr} + 2.86 \text{ lbs/yr}] \times 1 \text{ ton}/2,000 \text{ lbs} \\
 &= 0.72 \text{ ton per year}
 \end{aligned}$$

Where:

78 scf/hr = maximum hourly fuel input to pilot per the permittee's application;

52,083 scf/hr = maximum hourly input of waste gas per the permittee's application

5.5 lbs/million scf = VOC emissions factor from AP-42 Table 1.4-2 (7/98);

7,198 lbs/hr = maximum hourly throughput capacity of waste gas, per the permittee's application;

10 = maximum number of maintenance events per year, with each event lasting one hour per the permittee's application; and

98% = VOC control efficiency of flare.

b. Emissions Limitation:

CO emissions shall not exceed 0.03 ton per month averaged over a twelve month rolling period.

Applicable Compliance Method:

Compliance with the CO emissions limitation is demonstrated by the following calculations as presented in the permittee's application:

CO (tons per month averaged over a twelve-month rolling period)



$$\begin{aligned} &= [(CO \text{ emissions factor for natural gas fuel, in lb/million scf} \times \text{maximum hourly natural gas input to pilot, in scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (CO \text{ emissions factor for flare operations, in lb/million BTU} \times \text{maximum hourly waste gas input to flare, in million BTU/hr} \times \text{number of maintenance events/yr})] \times 1 \text{ ton}/2,000 \text{ pounds} \times 1 \text{ year}/12 \text{ months} \\ &= [(84 \text{ lb CO/million scf} \times 78 \text{ scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (0.37 \text{ lb CO/million BTU} \times 145.83 \text{ million BTU/hr} \times 10 \text{ maintenance events/yr})] \times 1 \text{ ton}/2,000 \text{ lbs} \times 1 \text{ year}/12 \text{ months} \\ &= [57.40 \text{ lbs/yr} + 539.57 \text{ lbs/yr}] \times 1 \text{ ton}/2,000 \text{ lbs} \times 1 \text{ year}/12 \text{ months} \\ &= 0.03 \text{ ton per month} \end{aligned}$$

Where:

78 scf/hr = maximum hourly fuel input to pilot per the permittee's application;

84 lbs/million scf = CO emissions factor for burning of natural gas fuel from AP-42 Table 1.4-1 (7/98);

145.83 million BTU/hr = maximum hourly material heat input from waste gas per the permittee's application;

0.37 lb/million BTU = CO emissions factor for flare operations in AP-42 Table 13.5-1 (1/95); and

10 = maximum number of maintenance events per year, with each event lasting one hour per the permittee's application.

c. Emissions Limitation:

SO₂ emissions shall not exceed 0.02 ton per month averaged over a twelve month rolling period.

Applicable Compliance Method:

Compliance with the SO₂ emissions limitation is demonstrated by the following calculations as presented in the permittee's application:

SO₂ (tons per month averaged over a twelve-month rolling period)

$$= [(SO_2 \text{ emissions factor for natural gas fuel, in lb/million scf} \times \text{maximum hourly natural gas input to pilot, in scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (SO_2 \text{ emissions factor from permittee's application, in lb/lb of fuel} \times \text{maximum hourly flared gas input to flare, in lbs/hr} \times \text{number of maintenance events/yr})] \times 1 \text{ ton}/2,000 \text{ pounds} \times 1 \text{ year}/12 \text{ months}$$



Final Permit-to-Install and Operate

Ergon Trucking, Inc.- Marietta

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$$= [(0.6 \text{ lb SO}_2/\text{million scf} \times 78 \text{ scf/hr} \times 1 \text{ million scf}/1,000,000 \text{ scf} \times 8,760 \text{ hrs/yr}) + (0.005 \text{ lb SO}_2/\text{lb of fuel} \times 7,198 \text{ lbs/hr} \times 10 \text{ maintenance events/yr})] \times 1 \text{ ton}/2,000 \text{ lbs} \times 1 \text{ year}/12 \text{ months}$$

$$= [0.41 \text{ lbs/yr} + 359.9 \text{ lbs/yr}] \times 1 \text{ ton}/2,000 \text{ lbs} \times 1 \text{ year}/12 \text{ months}$$

$$= 0.02 \text{ ton per month}$$

Where:

78 scf/hr = maximum hourly fuel input to pilot per the permittee's application;

0.6 lb/million scf = SO₂ emissions factor for burning of natural gas fuel from AP-42 Table 1.4-2 (7/98);

7,198 lbs/hr = maximum hourly throughput capacity of waste gas, per the permittee's application;

0.005 lb/lb of fuel = SO₂ emissions factor; assumes 0.5% SO₂ per pound of waste gas, per the permittee's application; and

10 = maximum number of maintenance events per year, with each event lasting one hour per the permittee's application.

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 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified 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 ton per year may require the permittee to apply for and obtain a new PTIO.



2. T007, Tank 7

Operations, Property and/or Equipment Description:

T-8879, an internal floating roof, submerged fill storage tank with a 55,000 barrels (2,310,000 gallons) capacity and a maximum of 1,493,960 barrels (62,746,301 gallons) of annual throughput of crude oil with a maximum vapor pressure of 5 RVP

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Volatile organic compound (VOC) emissions shall not exceed 0.06 ton per month averaged over a twelve-month rolling period.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	<p>The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to VOC emissions since the calculated annual emission rate is less than 10 tons/yr taking into account the federally enforceable requirements of an internal floating roof and applicable vapor pressure range specified in 40 CFR Part 60, Subpart Kb and OAC rule 3745-21-09(L).</p> <p>See b)(2)b. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(L)	The requirements of this rule are equivalent to the requirements of 40 CFR Part 60, Subpart Kb, except as identified in c)(1), c)(2), d)(1) and e)(3) below.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b) [In accordance with 40 CFR 60.110b(a) and 60.112b(a), this emissions unit is a storage vessel with a capacity greater than 75 m ³ (19,815 gallons) that is used to store volatile organic liquids with maximum true vapor pressures > 5.2 kPa (0.75 psia) and < 76.6 kPa (11.1 psia) for which construction, reconstruction or modification is commenced after July 23, 1984.]	See b)(2)d., b)(2)e. and c)(4) below.
e.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	General Provisions

(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)(b) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. Owners or operators may choose to comply with 40 CFR part 65, Subpart C, to satisfy the requirements of 60.112b through 60.117b for storage vessels that are subject to this subpart that meet the specifications in paragraphs (e)(1)(i) and (ii) of 60.110b. When choosing to comply with 40 CFR Part 65, Subpart C, the monitoring requirements of 60.116b(c), (e), (f)(1), and (g) still apply. Other provisions applying to owners or operators who choose to comply with 40 CFR Part 65 are provided in 40 CFR 65.1.
- d. Owners or operators who choose to comply with 40 CFR Part 65, Subpart C, must also comply with 60.1, 60.2, 60.5, 60.6, 60.7(a)(1) and (4), 60.14, 60.15, and 60.16 for those storage vessels. All sections and paragraphs of Subpart A of this part that are not mentioned in this paragraph (e)(2) do not apply to owners or operators of storage vessels complying with 40 CFR Part 65, Subpart C, except that provisions required to be met prior to implementing 40 CFR Part 65 still



apply. Owners and operators who choose to comply with 40 CFR Part 65, Subpart C, must comply with 40 CFR Part 65, Subpart A.

c) Operational Restrictions

- (1) The permittee shall equip all openings, except stub drains, with a cover, seal or lid which is in a closed position at all times except when in actual use for tank gauging or sampling.
- (2) Automatic bleeder vents must 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, are to be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(a)(1)	Equip each storage vessel with a fixed roof in combination with an internal floating roof.
60.112b(a)(1)(i)	Ensure the internal floating roof is resting or floating on the liquid surface, except as provided in the rule.
60.112b(a)(1)(ii)(B)	Equip the internal floating roof with two seals mounted above the other to form a continuous closure that completely covers the space between the wall of the tank and the edge of the internal floating roof.
60.112b(a)(iii)	Ensure each opening in the noncontact internal floating roof, except for automatic bleeder vents and rim space vents, provides a projection below the liquid surface.
60.112b(a)(iv)	Ensure each opening in the internal floating roof, except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells and stub drains, is equipped with a cover or lid maintained in a closed position except when the device is in actual use. Each cover or lid must be equipped with a gasket, and covers on each access hatch and automatic gauge float well shall be



	bolted except when in use.
60.112b(v)	Equip automatic bleeder vents with a gasket and ensure the vents are closed at all times except when the roof is being floated off or being landed on the roof leg supports.
60.112b(vi)	Equip rim space vents with a gasket and set the vents to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
60.112b(vii)	Ensure each penetration of the internal floating roof for the purpose of sampling is a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
60.112b(viii)	Ensure each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof has a flexible fabric sleeve seal or a gasketed sliding cover.
60.112b(ix)	Ensure each penetration of the internal floating roof that allows for passage of a ladder has a gasketed sliding cover.

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

- (1) The permittee shall maintain a record of any period of time the fixed roof tank does not comply with the requirements of OAC rule 3745-21-09(L)(1).
- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(1)	Visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling and repair any holes tears or other openings before filling the storage vessel.
60.113b(a)(3) and (a)(2)	Visually inspect the internal floating roof and the primary and secondary seals through manholes and roof hatches once



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	every 12 months after the initial fill and either empty the tank or take any necessary corrective action within 45 days unless a 30-day extension is requested.
60.115b(a)(2)	Maintain a record of each inspection performed as required by 60.113b(a)(1) – (a)(4) that identifies the storage vessel and includes the inspection date and conditions observed.
60.116b(a)	Maintain copies of all records required by 40 CFR Part 60, Subpart Kb for a period of two years, except that records required by 60.116b(b) must be kept for the life of the storage vessel.
60.116b(b)	Maintain records showing the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
60.116b(c)	Maintain records of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period.
60.116b(e)	Determine the true vapor pressure using available data on storage temperature as determined pursuant to 60.116b(e)(1)-(e)(3).
60.7(b)	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility and any malfunction of the air pollution control equipment.

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) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section



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of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall notify the director (the appropriate Ohio EPA district office or local air agency) of any noncompliance with the design and operating requirements of OAC rule 3745-21-09(L)(1) within 30 days of the occurrence.
- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(5)	Notify the Administrator in writing at least 30 days prior to the filling of each storage vessel for which an inspection is required by paragraphs (a)(1) or (a)(4), except as provided in the rule.
60.7(a) and 60.115b(a)(1)	Provide an initial notification of the date construction of the affected facility commenced and the actual date of initial startup of the affected facility. Attach a report that describes the control equipment and certifies that the control equipment meets the specifications of 60.112b(a)(1) and 60.113b(a)(1).
60.115b(a)(3)	Furnish a report to the Administrator within 30 days of detecting any of the conditions outlined in 60.113b(a)(2) during the annual visual inspection conducted pursuant to 60.113b(a)(2), if applicable.
60.115b(a)(4)	Furnish a report to the Administrator within 30 days of an inspection conducted pursuant to 60.113b(a)(3) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control requirement defects listed in 60.113b(a)(3)(ii) are found. Each report shall identify the storage vessel, the reason it did not meet the specifications of 60.113b(a)(1) or (a)(3), and list each repair made, if applicable.
60.116b(d)	Notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the maximum true vapor pressure values for the applicable volume range.



f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.06 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

Compliance shall be determined by the following one-time calculation based on emissions estimates from TANKS Program 4.09 submitted in the permittee's application based on a maximum annual throughput of 62,746,301 gallons of crude oil with a maximum RVP of 5:

VOC (ton per month averaged over a twelve-month rolling period)

= annual VOC losses (rim seal, withdrawal and deck fitting), in lbs/yr X 1 ton/2,000 lbs X 1 yr/12 months

= 1,413.35 lbs/yr X 1 ton/2,000 lbs X 1 yr/12 months

= 0.06 ton per month

g) Miscellaneous Requirements

(1) None.