



1/6/2015

Tom Plute
 Ohio Oil Gathering II, LLC - Bells Run Terminal
 PO Box 430
 Frazeyburg, OH 43822

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0684000149
 Permit Number: P0117321
 Permit Type: OAC Chapter 3745-31 Modification
 County: Washington

Certified Mail

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

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)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

Ohio Oil Gathering II, LLC - Bells Run Terminal

Facility ID:	0684000149
Permit Number:	P0117321
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/6/2015
Effective:	1/6/2015



Division of Air Pollution Control
Permit-to-Install
for
Ohio Oil Gathering II, LLC - Bells Run Terminal

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	14
1. F001 Roadways & Parking.....	15
2. J001 Barge and Truck Loading	18
3. P801 Equipment Leaks	25



Final Permit-to-Install
Ohio Oil Gathering II, LLC - Bells Run Terminal
Permit Number: P0117321
Facility ID: 0684000149
Effective Date: 1/6/2015

Authorization

Facility ID: 0684000149
Facility Description: Pipeline Transportation of Crude Oil
Application Number(s): A0050125, A0051945
Permit Number: P0117321
Permit Description: Chapter 31 modification to increase roadways mileage and loading rack throughput.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$600.00
Issue Date: 1/6/2015
Effective Date: 1/6/2015

This document constitutes issuance to:

Ohio Oil Gathering II, LLC - Bells Run Terminal
34670 State Route 7
Newport, OH 45768

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

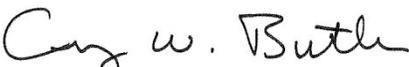
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0117321

Permit Description: Chapter 31 modification to increase roadways mileage and loading rack throughput.

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

Emissions Unit ID:	F001
Company Equipment ID:	Roadways & Parking
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	J001
Company Equipment ID:	Barge and Truck Loading Facility
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P801
Company Equipment ID:	Equipment Leaks
Superseded Permit Number:	P0115858
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Ohio Oil Gathering II, LLC - Bells Run Terminal
Permit Number: P0117321
Facility ID: 0684000149
Effective Date: 1/6/2015

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.



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) B.2.
2. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), for this project was not necessary because for the emissions units not exempted from modeling per OEPA Engineering Guide #69, 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 when controlled. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified PTI 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 PTI.
3. Specific emissions unit(s) included in this permit are subject to 40 CFR Part 63, Subparts A, Y, SS, and EEEE (J001) and A, H, and EEEE (P801). The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the e-CFR website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
4. 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.
5. Abbreviations throughout are as follows:

Pollutants

VOC	volatile organic carbon
PE	particulate emissions
NO _x	nitrogen oxides
CO	carbon monoxide
SO ₂	sulfur dioxide
PE	particulate emissions
PM ₁₀	particulate emissions, ≤ 10 microns
PM _{2.5}	particulate emissions, ≤ 2.5 microns

Units

TPY	tons per year
lb	pound
d	day
gal	gallon
MM	million
hr	hour
m	month
yr	year
VMT	vehicle miles traveled
scf	standard cubic feet

Regulations

OAC	Ohio Administrative Code
ORC	Ohio Revised Code



Final Permit-to-Install
Ohio Oil Gathering II, LLC - Bells Run Terminal
Permit Number: P0117321
Facility ID: 0684000149
Effective Date: 1/6/2015

CFR	Code of Federal Regulations
e-CFR	Electronic Code of Federal Regulation
BAT	Best Available Technology
MACT	Maximum Achievable Control Technology

General

PTE	Potential-to-Emit
PTI	Permit-to-Install
PER	Permit Evaluation Report
SIP	State Implementation Plan
EF	emissions factor



C. Emissions Unit Terms and Conditions



1. F001 Roadways & Parking

Operations, Property and/or Equipment Description:

Unpaved gravel road providing access to office and tank truck loading and unloading pads, 13 miles/d personnel trucks, 36 miles/d tankers trucks, 11 miles/d tractor trailers; increase in vehicle traffic attributable to the installation of the new truck loading operation constituting a Chapter 31 modification of a pre-existing source previously exempt from obtaining an installation permit

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) June 30, 2008	There shall be no visible emissions of PE except for three minutes during a 60-minute period.
b.	OAC 3745-17-07(B)(5)	This emissions limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	See b)(2)a. through b)(2)d. below.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably 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.

b. 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.

- c. 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.
- d. 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
-----------------------------------	-------------------------------------

all unpaved roads and parking areas	daily
-------------------------------------	-------

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned 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) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.



The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) See B.4.

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:

- There shall be no visible emissions of PE except for three minutes during a 60-minute period.

- Applicable Compliance Method:

- If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

- (1) None.



2. J001 Barge and Truck Loading

Operations, Property and/or Equipment Description:

Truck and barge loading of petroleum liquids and consisting of four loading arms controlled with flare with 100% capture and 98% control efficiency of VOC emissions, pilot 8,760 hr/yr (Chapter 31 modification to increase throughput and add a loading arm to an existing unit previously exempt from obtaining an installation permit)

- 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) June 30, 2008	<p>NO_x emissions from the flare shall not exceed 0.43 ton/m as a rolling, 12-month average.</p> <p>PM/PM₁₀/PM_{2.5} emissions from the flare shall not exceed 0.017 ton/m as a rolling, 12-month average.</p> <p>SO₂ emissions from the flare shall not exceed 0.00175 ton/m as a rolling, 12-month average.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	<p>The VOC emission limitation specified by this rule for truck loading is equivalent to the emission limitation established pursuant to 40 CFR Part 63, Subpart EEEE.</p> <p>Install a flare with 100% capture and 98% control efficiency for VOC emissions from the barge.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CO emissions from the flare shall not exceed 1.72 tons/m as a rolling, 12-month average.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b. below.
d.	40 CFR 63, Subpart EEEE (40 CFR 63.2330-63.2406) [In accordance with 40 CFR 63.2334, this emissions unit is an affected source consisting of an existing organic liquids distribution (OLD) operation.]	For all such loading arms at the rack, reduce emissions of total organic HAP from the loading of organic liquids into trucks by venting the emissions that occur during loading through a closed vent system to any combination of control devices meeting the applicable requirements of 40 CFR 63, Subpart SS, achieving at least 98 weight-percent HAP reduction. See b)(2)c. below.
e.	40 CFR 63, Subpart Y (63.560-63.568) [In accordance with 63.565(l), this emissions unit constitutes a source with emissions less than 10 or 25 tons as defined in 40 CFR 63.561.]	See d)(10) below.
f.	40 CFR Part 63, Subpart SS	See c)(4), d)(9), e)(3), and f)(3) below.
g.	40 CFR Part 63, Subpart A (63.1-63.16)	General provisions may apply.

(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, SO₂, and PM/PM₁₀/PM_{2.5} emissions from this air contaminant source since the PTE for NO_x, SO₂, and PM/PM₁₀/PM_{2.5} is less than 10 TPY.
- c. See 40 CFR Part 63, Subpart EEEE [40 CFR 63.2330 - 63.2406].
- d. See 40 CFR Part 63, Subpart SS [40 CFR 63.980 - 63.999].



c) Operational Restrictions

- (1) The permittee shall operate the flare at all times truck or barge loadout is being completed for the control of VOC emissions and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) See 40 CFR Part 63, Subpart EEEE [40 CFR 63.2330 - 63.2406].
- (4) See 40 CFR Part 63, Subpart SS [40 CFR 63.980 - 63.999].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the throughput of the emissions unit, in gal/d.
- (2) The permittee shall maintain records of the pilot/purge/supplemental gas use in scf/hr.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the flare while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and



- d. The name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) See 40 CFR Part 63, Subpart EEEE [40 CFR 63.2330 - 63.2406].
- (9) See 40 CFR Part 63, Subpart SS [40 CFR 63.980 - 63.999].
- (10) See 40 CFR Part 63, Subpart Y [40 CFR 63.560 - 63.568].

e) Reporting Requirements

- (1) See B. 4.
- (2) See 40 CFR Part 63, Subpart EEEE [40 CFR 63.2330 - 63.2406].
- (3) See 40 CFR Part 63, Subpart SS [40 CFR 63.980 - 63.999].
- (4) The permittee shall submit quarterly deviation reports that identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

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:

NO_x emissions from the flare shall not exceed 0.43 ton/m as a rolling, 12-month average.

Applicable Compliance Method:

The NO_x emissions limitation was derived by the calculation below using the EFs provided in the permittee's application. Compliance with the NO_x emissions limitation shall be determined by the calculation below and the records as required in d)(1) of this permit:



[Pilot/purge/supplemental gas heat input capacity (MMBtu/hr) x pollutant emission factor (lb/MMBtu) x 8,760 hr/yr / 2,000 (lb/ton)
+
Flare gas annual heat input capacity (MMBtu/yr) x pollutant emission factor (lb/MMBtu) / 2,000 (lb/ton)] / 12 months rolling = 0.43 ton/m as a rolling, 12-month average

Where:

Pilot/purge/supplemental gas heat input capacity MMBtu/hr = scf/hr x Btu/scf x MMBtu/10⁶ Btu

And

Flare gas heat input capacity MMBtu/hr = Mgal/yr x lb/Mgal x Btu/lb x MMBtu/10⁶ Btu x 0.98

And

gal/yr x Mgal/1,000 g = Mgal/yr

b. Emissions Limitation:

PM/PM₁₀/PM_{2.5} emissions from the flare shall not exceed 0.017 ton/m as a rolling, 12-month average.

Applicable Compliance Method:

The PM/PM₁₀/PM_{2.5} emissions limitation was derived by the calculation below using the EFs provided in the permittee's application. Compliance with the PM/PM₁₀/PM_{2.5} emissions limitation shall be determined by the calculation below and the records as required in d)(1) of this permit:

[Pilot/purge/supplemental gas heat input capacity (MMBtu/hr) x pollutant emission factor (lb/MMBtu) x 8,760 hr/yr / 2,000 (lb/ton)
+
Flare gas annual heat input capacity (MMBtu/yr) x pollutant emission factor (lb/MMBtu) / 2,000 (lb/ton)] / 12 months rolling = 0.017 ton/m as a rolling, 12-month average

Where:

Pilot/purge/supplemental gas heat input capacity MMBtu/hr = scf/hr x Btu/scf x MMBtu/10⁶ Btu

And

Flare gas heat input capacity MMBtu/hr = Mgal/yr x lb/Mgal x Btu/lb x MMBtu/10⁶ Btu x 0.98



And

$$\text{gal/yr} \times \text{Mgal}/1,000 \text{ g} = \text{Mgal/yr}$$

c. Emissions Limitation:

SO₂ emissions from the flare shall not exceed 0.00175 ton/m as a rolling, 12-month average.

Applicable Compliance Method:

The SO₂ emissions limitation was derived by the calculation below using the EFs provided in the permittee's application. Compliance with the SO₂ emissions limitation shall be determined by the calculation below and the records as required in d)(1) of this permit:

$$\begin{aligned} & [\text{Pilot/purge/supplemental gas heat input capacity (MMBtu/hr)} \times \text{pollutant} \\ & \text{emission factor (lb/MMBtu)} \times 8,760 \text{ hr/yr} / 2,000 \text{ (lb/ton)} \\ & + \\ & \text{Flare gas annual heat input capacity (MMBtu/yr)} \times \text{pollutant emission factor} \\ & \text{(lb/MMBtu)} / 2,000 \text{ (lb/ton)}] / 12 \text{ months rolling} = 0.00175 \text{ ton/m as a rolling, 12-} \\ & \text{month average} \end{aligned}$$

Where:

$$\text{Pilot/purge/supplemental gas heat input capacity MMBtu/hr} = \text{scf/hr} \times \text{Btu/scf} \times \text{MMBtu}/10^6 \text{ Btu}$$

And

$$\text{Flare gas heat input capacity MMBtu/hr} = \text{Mgal/yr} \times \text{lb/Mgal} \times \text{Btu/lb} \times \text{MMBtu}/10^6 \text{ Btu} \times 0.98$$

And

$$\text{gal/yr} \times \text{Mgal}/1,000 \text{ g} = \text{Mgal/yr}$$

d. Design Standard:

Install a flare with 100% capture and 98% control efficiency for VOC emissions from the barge.

Applicable Compliance Method:

Compliance shall be demonstrated by installing a flare with manufacturer's design specifications of 100% capture and 98% control efficiency for VOC emissions.



e. Emissions Limitation:

CO emissions from the flare shall not exceed 1.72 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

The CO emissions limitation was derived by the calculation below using the EFs provided in the permittee's application. Compliance with the CO emissions limitation shall be determined by the calculation below and the records as required in d)(1) of this permit:

$$\begin{aligned}
 & [\text{Pilot/purge/supplemental gas heat input capacity (MMBtu/hr)} \times \text{pollutant} \\
 & \text{emission factor (lb/MMBtu)} \times 8,760 \text{ hr/yr} / 2,000 \text{ (lb/ton)} \\
 & + \\
 & \text{Flare gas annual heat input capacity (MMBtu/yr)} \times \text{pollutant emission factor} \\
 & \text{(lb/MMBtu)} / 2,000 \text{ (lb/ton)}] / 12 \text{ months rolling} = 1.72 \text{ tons/m as a rolling, 12-} \\
 & \text{month average}
 \end{aligned}$$

Where:

$$\text{Pilot/purge/supplemental gas heat input capacity MMBtu/hr} = \text{scf/hr} \times \text{Btu/scf} \times \text{MMBtu}/10^6 \text{ Btu}$$

And

$$\text{Flare gas heat input capacity MMBtu/hr} = \text{Mgal/yr} \times \text{lb/Mgal} \times \text{Btu/lb} \times \text{MMBtu}/10^6 \text{ Btu} \times 0.98$$

And

$$\text{gal/yr} \times \text{Mgal}/1,000 \text{ g} = \text{Mgal/yr}$$

(2) See 40 CFR Part 63, Subpart EEEE [40 CFR 63.2330 - 63.2406].

(3) See 40 CFR Part 63, Subpart SS [40 CFR 63.980 - 63.999].

g) Miscellaneous Requirements

(1) None.



3. P801 Equipment Leaks

Operations, Property and/or Equipment Description:

Equipment leaks from various components including valves, flanges, and pumps (Chapter 31 modification of P0115858 associated with the installation of additional piping components)

- 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) June 30, 2008	VOC emissions shall not exceed 1.63 tons/m as a rolling, 12-month average.
b.	40 CFR, Part 63, Subparts EEEE and H [40 CFR 63.2330 – 63.2406 and 40 CFR 63.160 – 63.183] [In accordance with 40 CFR 63.2334, this emissions unit is an affected source consisting of an existing organic liquids distribution (OLD) operation, subject to the emission limitations/control measures specified in this section. The equipment leaks from affected equipment in this operation are subject to the emissions limitations and control measures specified in Subparts EEEE and H.]	You must meet each requirement in Table 4 to Subpart EEEE of Part 63 that applies to your equipment leaks: Comply with the requirements for pumps, valves, and sampling connections in 40 CFR part 63, subpart TT (control level 1), subpart UU (control level 2), or subpart H. [40 CFR part 63, Subpart EEEE, Table 4]
c.	40 CFR, Part 63, Subpart A [40 CFR 63.1 through 63.16]	Table 12 to 40 CFR, Part 63, Subpart EEEE – Applicability of General Provisions to Subpart EEEE shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply. Table 4 to 40 CFR, Part 63, Subpart H –



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Applicable 40 CFR Part 63 General Provisions shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply.

(2) Additional Terms and Conditions

- a. In order to meet the requirements in 40 CFR Part 63, Subpart EEEE, the facility has chosen to comply with the requirements of Subpart H.
- b. For each pump, valve, and sampling connection system affected by 40 CFR 63, Subpart EEEE and that operates in organic liquids service for at least 300 hours per year, the permittee shall carry out a leak detection and repair program or equivalent control according to Subpart H.
- c. Permittee shall identify each piece of equipment in a process unit to which 40 CFR, Part 63 Subpart H applies such that it can be distinguished readily from equipment that is not subject to that subpart.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subparts EEEE and H [40 CFR 63.2330 - 63.2406 and 63.160 - 63.183].

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subparts EEEE and H [40 CFR 63.2330 - 63.2406 and 63.160 - 63.183].

e) Reporting Requirements

- (1) See B.4.
- (2) See 40 CFR Part 63, Subparts EEEE and H [40 CFR 63.2330 - 63.2406 and 63.160 - 63.183].

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

VOC emissions shall not exceed 1.63 tons/m as a rolling, 12-month average.



Applicable Compliance Method:

Compliance with the fugitive VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors provided in Table 2-4 of US EPA's Protocol for Equipment Leak Emission Estimates (11/95) for components in gas and light oil service and the information provided in the permittee's application:

$$\sum (\text{componentcount} * \text{maxleakrates} * \text{VOCfraction} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{1 \text{ ton}}{2,000 \text{ lb}} * \frac{1 \text{ yr}}{12 \text{ mrolling}}) \leq 1.63 \text{ ton/mrolling 12}$$

Where component counts, max leak rates, and VOC fractions are based on the data provided in the permittee's application.

- (2) See 40 CFR Part 63, Subparts EEEE and H [40 CFR 63.2330 - 63.2406 and 63.160 - 63.183].
- g) Miscellaneous Requirements
 - (1) None.