

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **14-05473**

A. **Source Description**

Marathon Ashland Petroleum Co. - Cincinnati Terminal is a bulk liquid terminal. Gasoline and non-gasoline products are received by barge. The liquids are unloaded, stored in storage tanks and loaded out via rail car, tank truck and some times by barge. The facility will become a synthetic minor with the creation of the PTI Terms and Conditions.

B. **Facility Emissions and Attainment Status**

This facility is located in Hamilton County, Ohio. Hamilton County is currently designated as moderate nonattainment for ozone. The county is designated as attainment for all other regulated criteria pollutants.

C. **Source Emissions**

Group emissions limits were created for the loading racks and storage tanks to provide operational flexibility. Ashland Petroleum handles a wide variety of products. Specific throughput restrictions and product restrictions are not practical.

Compliance with emission limitations for loading racks and storage tanks at this facility will be established by monthly emission calculations and rolling, 12-month summations of these calculations. The calculations will address total VOC emissions as well as individual and total HAPs. Stack testing and parametric monitoring requirement where applicable will also ensure compliance.

Emission limits for Volatile Organic Compounds:

Loading Racks (6)	55.8 TPY
Storage Tanks (27)	35.06 TPY
Emission limits	90.86 TPY

Emission limits for HAPs

Loading racks and tanks	9.9 TPY for individual HAPs
Loading racks and tanks	24.9 TPY for combined HAPs

D. **Conclusion**

The PTI emission limitations for loading racks and storage tanks at Ashland Petroleum (OEPA PN: 1431071557) will be less than 100 TPY for VOC emissions and less than 10 TPY of any single HAP and less than 25 TPY for the total of all HAPs. This facility will be exempt from the Title V requirements.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-05473**

CERTIFIED MAIL

DATE: 10/16/2003

Marathon Ashland Petroleum LLC
Greg Moore
539 South Main Street
Findlay, OH 45840

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$0** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: HCDES

Ohio-Kentucky-Indiana Regional Council of Governments

KY

IN

HAMILTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05473 FOR AN AIR CONTAMINANT SOURCE FOR
MARATHON ASHLAND PETROLEUM LLC**

On 10/16/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Marathon Ashland Petroleum LLC**, located at **4015 River Road, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05473:

Federally enforceable limitations for existing emission units.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Harry Schweitering, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05473

Application Number: 14-05473
APS Premise Number: 1431071557
Permit Fee: **To be entered upon final issuance**
Name of Facility: Marathon Ashland Petroleum LLC
Person to Contact: Greg Moore
Address: 539 South Main Street
Findlay, OH 45840

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4015 River Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Federally enforceable limitations for existing emission units.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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 party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	90.86

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
J004 - Gasoline Truck Loading Rack with Vapor Recovery Unit	OAC rule 3745-31-05(A)(3) See Section F.1.	OAC rule 3745-31-05(D)

40 CFR Part 60, Subpart XX

OAC rule 3745-21-09(Q)

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Issued: To be entered upon final issuance

Emissions Unit ID: **J004**

Applicable Emissions
Limitations/Control Measures

The emission limitation specified by this rule is less stringent than the emission limitation established in 40 CFR Part 60, Subpart XX and the emission limits contained in term A.2. below.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart XX and OAC 3745-31-05(D).

The mass emissions of volatile organic compounds (VOC) from the vapor control system shall not exceed 0.29 pound of VOC per 1000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

See terms B.5-9 and B.10.

The emission limitation specified by this rule is less stringent than the emission limitation established in 40 CFR Part 60, Subpart XX.

See terms B.1-4, B.11 and B.13.

See terms A.2.a, A.2.b and A.2.c.

2. Additional Terms and Conditions

2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section

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Emissions Unit ID: **J004**

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112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

- 2.b** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c** The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.
 - b. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- 2. The loading rack shall be equipped with a vapor control system whereby:
 - a. All vapors collected by the vapor collection system are vented to the vapor control system.
 - b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
- 3. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

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Emissions Unit ID: **J004**

4. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
5. The design of the system shall prevent vapors collected at one loading rack from passing to another.
6. Gasoline loadings are made only into gasoline tank trucks equipped with vapor collection equipment compatible with the terminal's vapor collection system.
7. The terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at this emissions unit.
8. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4500 pascals (450 mm of water) during product loading. This level shall not be exceeded when measured by the procedures specified in 40 CFR 60.503(d).
9. No pressure-vacuum vent in the terminal's vapor collection system shall begin to open at a system pressure less than 4500 pascals (450 mm of water).
10. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
 - a. Obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck loaded at this emissions unit.
 - b. Require the tank identification number to be recorded as each gasoline tank truck is loaded at this emissions unit.
 - c. Cross-check each tank identification number obtained in Section B.10.b. above with the file for tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
 - d. Notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at this emissions unit within 3 weeks after the loading has occurred.
 - e. Not allow the reloading of nonvapor-tight gasoline trucks at this emissions unit until the vapor tightness documentation for the truck is obtained.
11. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
12. The temperature of the carbon bed, after regeneration [including any cooling cycle(s)], shall not be more than 10 percent above the maximum temperature for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

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Emissions Unit ID: **J004**

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13. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The total emissions of all combined HAPs, in tons.
 - d. The total throughput of gasoline, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all loading racks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. The permittee shall collect and record the following information for each day for the control equipment:
 - a. A log of the downtime for the capture (collection) system, control device, and monitoring

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Emissions Unit ID: **J004**

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equipment, when the emissions unit was in operation.

- b. During the regeneration cycle, the vacuum pressure in inches of Hg.
- c. The gasoline supply temperature in degrees F.
- d. The absorber pressure in psi.
- e. The carbon bed temperatures in degrees F.

5. The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the carbon adsorption/gasoline absorption vapor recovery unit which has been approved by the appropriate Ohio EPA District Office or local air agency. The PMP shall include an annual inspection of the vapor recovery unit by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the appropriate Ohio EPA District Office or local air agency.
6. The permittee shall maintain the data required by the vapor recovery unit manufacturer's recommended daily operating guidelines on a daily basis. The permittee shall submit a copy of the manufacturer's recommended daily operating guidelines to the appropriate Ohio EPA District Office or local air agency within 90 days of the issuance of this permit. Any subsequent changes to these guidelines shall be mutually agreeable to the permittee and the appropriate Ohio EPA District Office or local air agency.
7. The permittee shall maintain records, at the terminal, of the tank truck vapor tightness documentation required under Section B.10.a, in accordance with 40 CFR 60.505(b). The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by 40 CFR Part 60, Appendix A, Method 27.
8. The permittee shall maintain records of each monthly leak inspection required under Section C.9, in accordance with 40 CFR 60.505(c).
9. The permittee shall maintain records of all notifications required under Section B.10.d.
10. The permittee shall maintain records for all replacements or additions of components performed on the vapor processing system.
11. Each calendar month during the loading of gasoline tank trucks, the permittee shall inspect the vapor collection system, the vapor control system, and each gasoline loading rack for total organic compounds liquid or vapor leaks. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after the leak is detected.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the following:
 - a. The rolling, 12-month summation limitations contained in A.2.a, b and c.

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- b. Any parameter readings that are outside of the acceptable value for each vapor recovery unit key operating parameter established in Section B.12 above.

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The permittee shall submit quarterly summaries which include a log of the operating time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted to demonstrate compliance with the mass emission limit of 0.29 pound of VOC per 1000 gallons loaded.
 - b. The compliance test methods and procedures for the emission test for this emission unit shall follow those specified in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded.
 - c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - d. The vacuum across the carbon beds shall be measured and recorded during the emissions test(s) at a frequency agreed upon by the permittee and the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

2. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
3. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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Emissions Unit ID: **J004**

Issued: To be entered upon final issuance

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in the permit to install 14-331 issued on April 29, 1981: A-D.
2. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.
3. Other than the permitting action associated with air permit to install number 14-331 issued on April 29, 1981, all emissions units contained within this permitting action (air permit to install number 14-05473) are existing sources that did not trigger the need to obtain air permits to install. In addition, this permitting action is necessary because the issued FESOP for this

Marathon Ashland Petroleum LLC

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Issued

Facility ID: 1431071557

Emissions Unit ID: **J004**

facility has expired and therefore the facility does not currently have federally enforceable terms and conditions to restrict HAP and VOC tons per year emissions to below Title V threshold permitting levels. This permitting action is to secure those federally enforceable terms and conditions as part of the ozone re-designation project for the Cincinnati area.

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PTI A

Emissions Unit ID: J006

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
J006 - Non-Gasoline Truck Load Rack Controlled with a Flair (Up River - Tresler)	OAC rule 3745-21-07(E) OAC rule 3745-31-02(A)(2)	The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons, unless the organic compound emissions have been reduced by at least 90%, by weight, for the entire day. See A.2 below.

2. Additional Terms and Conditions

- 2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.b The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.c** The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1.** When employing the flare as a control device, all material loading from this emission unit shall be accomplished in such a manner that all displaced vapors and gases shall be vented only to the flare.
- 2.** A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- 3.** A pilot flame shall be maintained at all times in the flare's pilot burner during periods when the flare is used to control the organic compound emissions from this emissions unit.

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain the following monthly emission information for this emissions unit:

 - a.** The total emissions of VOC, in tons.
 - b.** The total emissions of each individual HAP, in tons.
 - c.** The aggregate sum of all HAPs, in tons.
 - d.** The total, individual throughout of non-gasoline materials, in gallons.
- 2.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:

 - a.** The total emissions of VOC, in tons.
 - b.** The total emissions of each individual HAP, in tons.
 - c.** The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain rolling, 12-month summations for the following:

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- a. The total emissions of VOC from all emissions units at the facility, in tons.
- b. The total emissions of VOC from all loading racks at the facility, in tons.
- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

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4. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare's pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. This monitoring device shall include an interlock that prevents the loading of non-gasoline materials when the flare's pilot flame is not operational.
5. Each business day, the permittee shall verify that the flare's pilot flame and flame sensor are functioning properly when the emissions unit is in operation. The permittee shall record the results of the daily flare pilot flame and flame sensor inspections.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit semi-annual deviation (excursion) reports which identify all periods during which the flare's pilot flame and flame sensor were not functioning properly when the flare was used to control the organic compound emissions from this emissions unit.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted to demonstrate compliance with the required 90% destruction efficiency.

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- b. The compliance test methods and procedures for the emission test shall follow those specified in Method 25B of 40 CFR Part 60, Appendix A.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

- 2. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent

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VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
3. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the

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Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J007 - Non-Gasoline Railcar Load Rack	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-31-02(A)(2)	See A.2.a, b and c below.

2. Additional Terms and Conditions

- 2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.b The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

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B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughout of all non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all loading racks at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:

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- a. The identification of each product.
- b. Documentation on whether the product is a volatile photochemically reactive material.
- c. The total throughput, in gallons, of all volatile photochemically reactive materials.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent

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VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

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2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J008 - Barge Loading/Unloading Area (Up River - Tresler)	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-31-02(A)(2)	See A.2.a, b and c below.

2. Additional Terms and Conditions

- 2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.b The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

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B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughout of all non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all loading racks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:

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- a. The identification of each product.
- b. Documentation on whether the product is a volatile photochemically reactive material.
- c. The total throughput, in gallons, of all volatile photochemically reactive materials.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l

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leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland

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F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J102 - Non-Gasoline Truck Load Rack (Down River - Texaco)	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-31-02(A)(2)	See A.2.a, b and c below.

2. Additional Terms and Conditions

- 2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.b The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d The maximum daily throughput of all volatile photochemically reactive materials, as defined in

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OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

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Emissions Unit ID: **J102**

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughout of all non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all loading racks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:

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- a. The identification of each product.
- b. Documentation on whether the product is a volatile photochemically reactive material.
- c. The total throughput, in gallons, of all volatile photochemically reactive materials.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l

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leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland

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F. Miscellaneous Requirements

- 1.** The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J103 - Barge Loading/Unloading Area (Down River - Texaco)	OAC rule 3745-31-05(A)(3) See Section F.1.	21.8 pounds of organic compounds (OC) per day 4.0 tons of OC per year use of submerged filling for barges See A.2.e below.
	OAC rule 3745-21-07(E)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(E) and 3745-31-05(D). See A.2.d below.
	OAC rule 3745-31-05(D)	See A.2.a, b and c below.

2. Additional Terms and Conditions

- 2.a The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.b The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to

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the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

- 2.c** The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.
- 2.e** The amount of all materials loaded by this emissions unit shall not exceed 1,680,000 gallons per day.

B. Operational Restrictions

- 1.** A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- 2.** The vapor pressure of any material loaded into the barges shall not exceed 0.0085 psia, at 60 degrees F.

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a.** The total emissions of VOC, in tons.
 - b.** The total emissions of each individual HAP, in tons.
 - c.** The aggregate sum of all HAPs, in tons.
- 2.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a.** The total emissions of VOC, in tons.
 - b.** The total emissions of each individual HAP, in tons.

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- c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all loading racks at the facility, in tons
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. The identification of each material loaded.
 - b. Documentation on whether the material loaded is a volatile photochemically reactive material.
 - c. The vapor pressure of each material loaded, in psia, at 60 degrees F.
 - d. The total throughput, in gallons, of all volatile photochemically reactive materials.
 - e. The total throughput, in gallons, of all materials.
 - f. The total OC emissions, in pounds.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the following:
 - a. The rolling, 12-month summation limitations contained in A.2.a, b and c.
 - b. The vapor pressure limitation of .00085 psia, at 60 degrees F.
 - c. The pound per day emission limitation in A.1.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and

shall cover the previous 6 months of operation.

3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded or days during which more than 1,680,000 gallons of all materials were loaded, and the actual volumes of the volatile photochemically reactive materials and all materials loaded during each such day.
4. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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5. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-2566 as issued on April 29, 1992: A-D.
2. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.
3. Other than the permitting action associated with air permit to install number 14-2566 issued on April 29, 1992, all emissions units contained within this permitting action (air permit to install number 14-05473) are existing sources that did not trigger the need to obtain air permits to install. In addition, this permitting action is necessary because the issued FESOP for this facility has expired and therefore the facility does not currently have federally enforceable terms and conditions to restrict HAP and VOC tons per year emissions to below Title V threshold permitting levels. This permitting action is to secure those federally enforceable terms and conditions as part of the ozone re-designation project for the Cincinnati area.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T001 - 0.96 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated

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- off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
 - 2.b** When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
 - 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 - 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 - 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.

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- b. The total emissions of VOC from all storage tanks at the facility, in tons.
- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- 4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent

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VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the

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Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T007 - 0.41 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

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- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;

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- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T008 - 0.84 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC Rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T014 - 2.2 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T018

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T018 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 374531-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

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rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every

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individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T019

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T019 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

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- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T020 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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Emissions Unit ID: **T020**

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T027 - 0.96 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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Emissions Unit ID: **T027**

Issued: To be entered upon final issuance

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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Emissions Unit ID: **T027**

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

Emissions Unit ID: T027

the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PTI A

Emissions Unit ID: T031

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T031 - 0.4 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

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- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

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Emissions Unit ID: **T031**

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- c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PTI A

Emissions Unit ID: T037

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T037 - 0.68 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4.** The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which document all exceedances of the

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rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every

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individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T038

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T038 - 3.34 Million Gallon Internal Floating Roof Storage Tank with Submergible Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

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- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T041 - 0.59 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

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- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

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- c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for

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each individual HAP.

- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T042 - 0.21 Million Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

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- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.

- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- 4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

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e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

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Facility ID: 1431071557

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F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T043

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T043 - 0.21 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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Emissions Unit ID: **T043**

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

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- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

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Emissions Unit ID: **T043**

- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PTI A

Emissions Unit ID: T044

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T044 - 0.21 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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Emissions Unit ID: **T044**

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.

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Emissions Unit ID: **T044**

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- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42,

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5th Edition, Equation 5.2-1.

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2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions.

These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

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Issued

Facility ID: 1431071557

Emissions Unit ID: T044

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T045

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T045 - 0.21 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month

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summation.

- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.

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Facility ID: 1431071557

Emissions Unit ID: T045

- b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.

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Emissions Unit ID: **T045**

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- b. The total emissions of VOC from all storage tanks at the facility, in tons.
- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing

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the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2.** To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland

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Emissions Unit ID: T045

Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T046

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T046 - 0.41 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.

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- c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- 4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background

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Information for Proposed Standards, Table C-4).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

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F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T047 - 0 .41 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.

- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.

- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.

- b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- 4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak

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Emission Estimates."

- c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be

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determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T048 - 0.44 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4.** The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which document all exceedances of the

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rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every

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individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T049 - 0.44 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

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- c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PTI A

Emissions Unit ID: T051

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T051 - 3.1 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

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rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every

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individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PTI A

Emissions Unit ID: T052

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T052 - 2.46 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4.** The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which document all exceedances of the

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rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every

Emissions Unit ID: T052

individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T053

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T053 - 3.34 Million Gallon Fixed Roof Storage Tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-31-02(A)(2)	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- 2.a This emissions unit is prohibited from storing any volatile photochemically reactive material, as defined in OAC rule 3745-21-01(C)(7), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any volatile photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
- 2.b The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.c The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month

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- 2.d** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

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- c. The aggregate sum of all HAPs, in tons.
- 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- 4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

- c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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Emissions Unit ID: **T053**

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- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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Emissions Unit ID: T118

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T118 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5),

are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

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- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the

rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T119 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T120 - 1.0 Million Gallon Internal Floating Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7), are stored in this emissions unit, the following requirements shall apply:

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- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a volatile photochemically reactive

material.

- c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2.** The permittee shall maintain the following monthly emission information for this emissions unit:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3.** The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4.** The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive

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emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T121 - 1.0 Million Gallon Internal Fixed Roof Storage Tank with Submerged Fill Pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-31-02(A)(2)	See A.2.c, d and e below.

2. Additional Terms and Conditions

- 2.a When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

- 2.b When volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(7),

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are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading volatile photochemically reactive materials.
 - ii. The vapor pressure of any volatile photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
 - iii. The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.c** The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.d** The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- 2.e** The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.

- b. Documentation as to whether the material stored is a volatile photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of VOC from all storage tanks at the facility, in tons.
 - c. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - d. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

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2. The permittee shall submit deviation (excursion) reports which identify all periods when any volatile photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using AP-42, 5th Edition, Chapter 7, Liquid Storage Tanks.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for

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the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to install are federally enforceable requirements: A-F.