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

Certified Mail

2/27/2015

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

Mike Kolovich
Buckeye Terminals, LLC - Lorain Terminal
993 Brodhead Road
Suite 100
Moon Township, PA 15108

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0247000023
Permit Number: P0118419
Permit Type: Administrative Modification
County: Lorain

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-NEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals, LLC - Lorain Terminal

Facility ID:	0247000023
Permit Number:	P0118419
Permit Type:	Administrative Modification
Issued:	2/27/2015
Effective:	2/27/2015
Expiration:	7/11/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals, LLC - Lorain Terminal

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Authorization

Facility ID:	0247000023
Application Number(s):	M0003239
Permit Number:	P0118419
Permit Description:	Upon receiving a Chapter 31 Modification application, it was determined that the facility-wide VOC emissions limitation should be 91.6 tons per year instead of 92.7 tons per year.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	2/27/2015
Effective Date:	2/27/2015
Expiration Date:	7/11/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Buckeye Terminals, LLC - Lorain Terminal
12545 AVON BELDON ROAD
Eaton Twp., OH 44044

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118419
Permit Description: Upon receiving a Chapter 31 Modification application, it was determined that the facility-wide VOC emissions limitation should be 91.6 tons per year instead of 92.7 tons per year.

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

Emissions Unit ID:	**J001**
Company Equipment ID:	Loading Rack
Superseded Permit Number:	P0085165
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T001**
Company Equipment ID:	Tank #7
Superseded Permit Number:	P0085165
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T002**
Company Equipment ID:	Tank #1
Superseded Permit Number:	P0085165
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	Tank #2
Superseded Permit Number:	P0085165
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T017**
Company Equipment ID:	Tank #8
Superseded Permit Number:	P0118240
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) B.2, B.3, B.4, B.5, B.6 and B.7

2. This permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the facility. The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:

   a) The total combined annual emissions from all facility emissions units, including permit to install and operate, exempt, and "de minimis" emissions units, shall not exceed the following as rolling, 12-month summations:

      (1) VOC emissions shall not exceed 91.6 tons;

      (2) total combined HAPs emissions shall not exceed 24.9 tons; and

      (3) any individual HAP emissions shall not exceed 9.9 tons.

   b) Maximum annual throughput limitations for gasoline and distillates at the loading rack (J001) as specified in sections C.1.c)(1) and C.1.c)(2).

   c) The permittee shall load and/or store petroleum-based products only.

3. The permittee shall collect and record the following VOC information each month for emissions units J001, T001-T003, and T017, combined, and “de minimis” and exempt emissions units:

   a) the company identification of each petroleum liquid loaded or stored;

   b) the calculated VOC emissions from all petroleum liquids loaded and/or stored in emissions units J001, T001-T003, and T017, combined, in tons;

   c) the calculated VOC emissions from all petroleum liquids loaded and/or stored in “de minimis” and exempt emissions units, in tons;

   d) the total VOC emissions from all petroleum liquids loaded and/or stored for all emissions units facility-wide combined, in tons [summation of B.3.b) and B.3.c)]; and

   e) after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

4. The permittee shall collect and record the following HAP information each month for all emissions units at the facility combined:

   a) the company identification of each petroleum liquid loaded and/or stored;

   b) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in emissions units J001, T001-T003, and T017, combined, in tons, based on the following:

      (1) multiply the VOC emissions from section B.3.b) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);

   c) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in "de minimis" and exempt emissions units, in tons, based on the following:

      (1) multiply the VOC emissions from section B.3.c) above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006);

   d) the total emission rate for each individual HAP from all petroleum liquids loaded and/or stored, in tons [summation of B.4.b) and B.4.c)];

   e) the total emission rate for combined HAPs from all petroleum liquids stored and/or loaded, in tons [summation of B.4.d)]; and

   f) after the first 12 calendar months following the issuance of this permit, the rolling, 12-month individual HAP emissions and combined HAPs emissions, in tons.

5. The permittee shall submit quarterly deviation reports that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

      (1) the rolling, 12-month VOC emission limitation of 92.7 tons;

      (1) the rolling, 12-month individual HAP emission limitation of 9.9 tons;

      (2) the rolling, 12-month total combined HAPs emission limitation of 24.9 tons;

      (3) the probable cause of each deviation (excursion);

      (4) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

      (5) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Ohio EPA's Northeast District Office.

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

6. Testing Requirements

a) Compliance with the emission limitations in B.2.a) above shall be determined in accordance with the following method(s):

(1) Emission Limitation:

VOC emissions shall not exceed 92.7 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based upon the records required pursuant to B.3 above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.

ii. 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."

iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).

iv. The VOC emissions from gasoline, transmix or distillate truck loading shall be determined, using AP- 42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

(2) Emission Limitations:

Total combined HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period from all facility emissions units.

Any individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be based upon the records required pursuant to B.4 above.

7. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html

The area source MACT/GACT rules that may be applicable include 40 CFR Part 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities).

C. Emissions Unit Terms and Conditions

1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Loading rack at a bulk gasoline and petroleum distillate products bulk terminal with a carbon adsorption vapor recovery unit (VRU) to control organic compound emissions

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

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

a. None.

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

a. b)(1)a, b)(2)a, f)(1)a and f)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	VOC emissions from the vapor control system shall not exceed 80 mg per liter of material loaded. See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-21-09(Q)	See c)(3) through c)(8), d)(1), d)(2) and e)(1). The emission limits established under this rule are less stringent than the emission limits established for VOC pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Each continuous VOC monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9. At least 45 days before commencing certification testing of the continuous VOC monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of VOC emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous VOC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

b. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

c) Operational Restrictions

(1) The maximum annual throughput of gasoline shall not exceed 239,000,000 gallons for this emissions unit based upon a rolling, 12-month summation of the gasoline throughput.

(2) The maximum annual throughput of distillates shall not exceed 300,000,000 gallons for this emissions unit based upon a rolling, 12-month summation of the distillates throughput.

(3) 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: and

b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.

(4) 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; and

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.

(5) The loading rack shall be provided with a means 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.

(6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

(7) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

(8) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and 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.

d) Monitoring and/or Recordkeeping Requirements

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

a. the total, individual throughputs of gasoline and distillates; and

b. the rolling, 12-month summations of the individual throughputs of gasoline and distillates, in gallons.

(2) The permittee shall install, operate, and maintain equipment to continuously monitor and record VOC emissions from this emissions unit in units of the applicable standard(s), using the detection principle of the reference method specified in the regulation(s) or this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous VOC monitoring system including, but not limited to:

a. emissions of VOCs in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

b. emissions of VOCs in units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous VOC monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

(3) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

(4) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels, using the 40 CFR Part 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last 5 minutes of the adsorption cycle for each vessel shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.

Once a VOC CEMS is installed, certified and operating in accordance with the quality assurance/quality control plan specified in b)(2)a., the permittee shall not be required to monitor the VOC exhaust gas concentration on a monthly basis because VOC emissions shall be monitored and recorded on a continuous basis. However, in the event that the CEM is non-operational, the permittee shall default to monitoring the VOC exhaust gas concentration from both carbon adsorption vessels on a monthly basis, using the 40 CFR Part 60, Appendix A, Method 21 procedure for open ended lines.

e) Reporting Requirements

(1) The permittee shall comply with the following semi-annual reporting requirements for the emissions unit and its continuous VOC monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit semi-annual reports within 30 days following the end of each semi-annual period to the Ohio EPA's Northeast District Office, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the

corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These semi-annual reports shall be submitted by January 31 and July 31 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous VOC and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total VOC emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous VOC monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous VOC monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous VOC monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous semi-annual period.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the semi-annual period, such information shall be documented in the EER semi-annual report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month throughput restrictions on gasoline and/or distillates;

ii. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or total combined HAPs;

iii. all exceedances of the VOC emission limitation of 80 mg per liter of material loaded from the vapor control system; and

iv. all deviations from the vapor collection system when the pressure is not maintained between minus 6 and plus 18 inches of water gauge pressure.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Ohio EPA's Northeast District Office.

(3) Any leaks in the vapor collection system or vapor control system 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 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (Ohio EPA's Northeast District Office) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this

permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

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

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from the vapor control system shall not exceed 80 mg per liter of material loaded.

Applicable Compliance Method:

Compliance with the emission limitation above shall be demonstrated based on the continuous emissions monitor (CEM) and the certification tests of the continuous VOC monitoring system required in f)(2).

If required, compliance with the mg per liter limitation shall be demonstrated based on the results of emissions testing conducted in accordance with the emission test methods and procedures are those outlined in OAC rule 3745-21-10(E).

(2) Within 180 days of permit issuance, the permittee shall conduct certification tests of the continuous VOC monitoring system pursuant to 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate); ORC section 3704.03(I); and using the VOC detection method that is appropriate for the VOC species present in the emission gases.

Personnel from the Ohio EPA Central Office and the Ohio EPA, Northeast District Office shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Northeast District Office and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous VOC monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 and ORC section 3704.03(I).

Ongoing compliance with the VOC emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data

collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

(3) If the permittee is not utilizing a CEM to demonstrate compliance with the emissions limitation, 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 within 3 months after issuance of the permit and within 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the following emissions limitation of:

VOC emissions from the vapor control system shall not exceed 80 mg per liter of material loaded.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E).

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA's Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA's Northeast District Office. 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's Northeast District Office's refusal to accept the results of the emission test(s).

f. Personnel from the Ohio EPA's Northeast District Office 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.

g. 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

Ohio EPA's Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA's Northeast District Office.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Gasoline and Distillate Oil Storage Tanks

EU ID	Operations, Property and/or Equipment Description
T001	654,424 gallon storage tank #7 for gasoline or petroleum distillate products with an internal floating roof and wiper and primary and secondary seals to minimize organic compound emissions
T002	1,508,058 gallon storage tank #1 for gasoline or petroleum distillate products with an internal floating roof, mechanical shoe primary seal and wiper secondary seal to minimize organic compound emissions
T003	1,167,451 gallon storage tank #2 for gasoline or petroleum distillate products with an internal floating roof, wiper primary and secondary seals to minimize organic compound emissions

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

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

a. None.

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

a. b)(1)a and f)(1)a

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	See Facility-Wide Terms and Conditions section B.2.a).
b.	OAC rule 3745-21-09(L)	See c)(1) and d)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals and/or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.

d. 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

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

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

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(2) The permittee shall maintain a record of any period of time during which the automatic bleeder vents, rim vents and all openings other than stub drains were not maintained as required in this permit and per the rules.

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

a. the total throughput of each stored liquids, in gallons; and

b. the rolling, 12-month summations of the individual throughputs of liquids stored, in gallons.

(4) The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in the Facility-Wide Terms and Conditions sections B.3, B.4 and B.6.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP and/or total combined HAPs;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Ohio EPA's Northeast District Office.

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

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

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Control measures and work practices necessary to reduce VOC emissions from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program.

g) Miscellaneous Requirements

(1) None.

3. T017, Gasoline and Distillate Oil Storage Tank

Operations, Property and/or Equipment Description:

354,325 gallon storage tank #8 for gasoline, petroleum distillate products, or ethanol with an internal floating roof, mechanical shoe primary seal & wiper secondary seal to minimize organic compound emissions

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	VOC emissions shall not exceed 0.2 ton per rolling, 12-month period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to VOC since the calculated annual emission rate is less than 10 tons per year. See b)(2)b. below.
c.	OAC rule 3745-21-09(L)(1)	The requirements of this paragraph are equivalent to those specified in 40 CFR Part 60, Subpart Kb.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b-117b)	In accordance with 40 CFR 60.112b(a)(1) this emissions unit is a storage vessel, for which construction commenced after July

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		23, 1984, with a capacity greater than 151 m^3, containing a volatile organic liquid (VOL) that, as stored, has a maximum true vapor pressure greater than or equal to 5.2 kPa but less than 76.6 kPa. See b)(2)c., c)(1), d)(1) and e)(1).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

c) Operational Restrictions

(1) These emissions units shall only be used to store petroleum liquids with a maximum true vapor pressure less than 76.6 kPa.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart Kb, including the following sections:

a. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the

secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Director (Ohio EPA's Northeast District Office) in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):

   i. the permittee shall visually inspect the vessel as specified in (a)(4) of 40 CFR 60.113b at least every 5 years; or

   ii. thepermittee shall visually inspect the vessel as specified in (a)(2) of 40 CFR 60.113b.

d. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of 40 CFR 60.113b and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of 40 CFR 60.113b.

e. The permittee shall keep a record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

f. The permittee shall keep copies of all records required by this section, except for the record required by §60.116b(b), for at least 2 years. The record required by §60.116b(b) will be kept for the life of the source.

g. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

h. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

i. The permittee may use available data on the storage temperature to determine the maximum true vapor pressure as specified below:

i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

ii. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:

(a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Director (Ohio EPA's Northeast District Office) specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

(b) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

e) Reporting Requirements

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

a. The permittee shall submit written notification at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (4) to the Director (Ohio EPA's Northeast District Office) to provide the opportunity to have an observer present. If the inspection is not planned and the permittee could not have known about the inspection 30 days in

advance of refilling the tank, the permittee shall notify Ohio EPA's Northeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by Ohio EPA's Northeast District Office at least 7 days prior to the refilling.

b. After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall furnish the Director (Ohio EPA's Northeast District Office) with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).

c. If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Director (Ohio EPA's Northeast District Office) within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

d. After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director (Ohio EPA's Northeast District Office) within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 0.2 ton per rolling, 12-month period.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated using: 'Tanks 4.0.9d', the latest version of Tanks computer software, or equivalent AP-42, Section 7.1, "Organic liquid Storage tanks' methodology issued by U.S. EPA for calculating tank emissions.

b. Emission Limitation:

Control measures and work practices necessary to reduce VOC emissions from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks or based upon the most recent version of the U.S. EPA's TANKS program.

g) Miscellaneous Requirements

(1) None.