



3/20/2015

Certified Mail

Steve Bland
CITGO Holding Terminals LLC.
1800 FARR DR
DAYTON, OH 45404

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0857040915
Permit Number: P0118278
Permit Type: OAC Chapter 3745-31 Modification
County: Montgomery

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Regional Air Pollution Control Agency 117 South Main Street Dayton, OH 45422-1280
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Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
RAPCA; Indiana; Kentucky

PUBLIC NOTICE

3/20/2015 Issuance of Draft Air Pollution Permit-To-Install and Operate

CITGO Holding Terminals LLC.

1800 FARR DRIVE,

Dayton, OH 45404

Montgomery County

FACILITY DESC.: Petroleum Bulk Stations and Terminals

PERMIT #: P0118278

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Federally Enforceable PTIO to install new VOC emissions controls and increase the rolling 12-month gasoline throughput volume restrictions for a bulk gasoline terminal.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrew Weisman, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The CITGO Petroleum Corporation, Dayton Terminal (CITGO) is a bulk liquid fuel terminal. Liquid fuels (gasoline and diesel fuel) are received at the terminal via pipeline and stored in nine above-ground storage tanks. The fuels are transferred from the storage tanks into tanker trucks for distribution to local gasoline and distillate dispensing facilities. Liquid fuels are transferred using a loading rack three truck bays and a total of 11 loading arms.

CITGO has submitted an application for a PTIO modification for the fuel loading to allow for an increase in the rolling 12-month gasoline throughput limitation from 197,347,642 gallons to 400,000,000 gallons. In order to accommodate the increase gasoline throughput CITGO will install a Vapor Combustion Unit (VCU) that will reduce the VOC emissions limitations from 0.50 pound per 1,000 gallons (60 milligrams per liter) of gasoline to 0.084 pound per 1,000 gallons (10 milligrams VOC per liter) of fuel transfers.

3. Facility Emissions and Attainment Status:

CITGO is located in Montgomery County, which has demonstrated attainment with all the NAAQS. CITGO emits a combination of VOCs generated by the storage and transfer of gasoline and gasoline additives, distillates (diesel fuel and kerosene), and ethanol.

The uncontrolled potential VOC emissions from CITGO are listed in the following table:

Uncontrolled Potential VOC Emissions

Emissions Unit	VOC Emissions (tons/year)
J001 – Loading rack	507
T001 – Tank 1	5.9
T002 – Tank 2	10.1
T003 – Tank 3	6.7
T004 – Tank 4	7.4
T005 – Tank 5	6.4
T006 – Tank 6	3.4
T007 – Tank 101	9.5
T008 – Tank 102	7.4
T009 – Tank 103	0.01
P005 - Soil Vapor Extraction Unit	2.7
Component Equipment Leaks	0.2
Total	567

The uncontrolled emissions VOC emissions rate in the previous table is based on the maximum potential gasoline throughput for the terminal (3,200 barrels x 42 gallons/barrel x 8,760 hours/year = 1,177,444,000 gallons/year) and compliance with the 0.67 pound VOC/1000 gallons (80 milligrams/liter) of fuel transferred emissions limitation of OAC rule 3175-21-09(Q)(1)(b)(ii).



Based on this uncontrolled VOC emissions rate CITGO would be subject to major source permitting requirements for prevention of significant deterioration (PSD) and Title V. The VOC emissions also include a variety of hazardous air pollutants (HAP) that would exceed the major source threshold of 10 tons per year for individual HAP and the 25 tons per year for combined HAP.

4. Source Emissions:

In order to avoid major source permitting requirements for VOC and HAP, CITGO has elected to limit liquid fuel throughput on a rolling 12-month basis. The liquid fuel throughput will be limited to:

Liquid Fuel	Volume (gallons on a rolling 12-month basis)
Gasoline and Ethanol (combined)	400,000,000
Distillates (diesel fuel and kerosene)	500,000,000

In addition to the throughput volume restrictions CITGO will also install the VCU designed to limit VOC emissions to 0.084 pound per 1,000 gallons of fuel loaded (10 milligrams/liter).

The combination of the throughput volume restrictions and VOC emissions limitations for the loading rack will reduce VOC emissions to:

- 57.1 tons for the fuel loading rack; and
- 94.1 tons as a total for the facility.

In addition, CITGO has elected to accept individual HAP emissions limitations of 9.9 tons and 24.9 tons on a rolling 12-month basis.

5. Conclusion:

Implementing the federally enforceable VOC and HAP emissions limitations described above and meeting the specified monitoring, record keeping and reporting established in this PTIO and PTIO P0115057 (for all other sources at CITGO) potential air pollutant emissions from all emissions units at the facility on a rolling 12-month basis will be limited to less than:

- 95.0 tons VOC;
- 9.9 tons individual HAP; and
- 24.9 tons for any combination of HAPs.

CITGO will avoid all major source permitting requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>95.0</u>
<u>Individual HAP</u>	<u>9.9</u>
<u>Combined HAP</u>	<u>24.9</u>



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO Holding Terminals LLC.**

Facility ID:	0857040915
Permit Number:	P0118278
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	3/20/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO Holding Terminals LLC.**

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Draft Permit-to-Install and Operate

CITGO Holding Terminals LLC.

Permit Number: P0118278

Facility ID: 0857040915

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0857040915
Application Number(s): A0051803
Permit Number: P0118278
Permit Description: Federally Enforceable PTIO to install new VOC emissions controls and increase the rolling 12-month gasoline throughput volume restrictions for a bulk gasoline terminal.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/20/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

CITGO Holding Terminals LLC.
1800 FARR DRIVE
Dayton, OH 45404

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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



Draft Permit-to-Install and Operate

CITGO Holding Terminals LLC.

Permit Number: P0118278

Facility ID: 0857040915

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0118278

Permit Description: Federally Enforceable PTIO to install new VOC emissions controls and increase the rolling 12-month gasoline throughput volume restrictions for a bulk gasoline terminal.

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:	P0117680
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

CITGO Holding Terminals LLC.

Permit Number: P0118278

Facility ID: 0857040915

Effective Date: To be entered upon final issuance

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 Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Draft Permit-to-Install and Operate
CITGO Holding Terminals LLC.
Permit Number: P0118278
Facility ID: 0857040915
Effective Date: To be entered upon final issuance

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.3. through B.11.
2. The permittee is advised that this facility may be subject to the “Generally Available Control Technology” (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart BBBBBB the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

Synthetic Minor VOC Emissions Limitations

3. The facility wide emissions of volatile organic compound (VOC) emissions shall not exceed 95.0 tons on a rolling 12-month basis.
4. The permittee shall collect and record the following information each month for all emissions units at the facility:
 - a) The combined VOC emissions, in tons, for all of the emissions units at the facility (the sum of the VOC emissions from each unit in operation at the facility calculated according to its monitoring and record keeping requirements identified in C.1.d)); and
 - b) The rolling 12-month VOC emissions rate, in tons, (the sum of the monthly VOC emissions rates from 4.a) for the previous 12-months.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring and record keeping in this permit:
 - a) all exceedances of the rolling, 12-month emission limitation for VOC;
 - a) the probable cause of each deviation (excursion);



- b) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- c) 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 Director (the appropriate District Office or local air agency).

6. Compliance with the emission limitations in B.3. shall be determined in accordance with the following methods:

- a) Emissions Limitation:

The facility wide VOC emissions shall not exceed 95.0 tons on a rolling 12-month basis. .

- Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.4.

Synthetic Minor HAP Emissions Limitations

7. The facility wide emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons for any individual HAP and 24.9 tons on a rolling 12-month basis for any combination of HAPs. This emissions limitation includes actual HAP emissions from all loading rack activity, storage tanks, fugitive emissions from loading rack activity, fugitive emissions from process equipment (pumps, valves and connectors), and permit exempt sources in gasoline, petroleum distillate (e.g., diesel fuel, kerosene, aviation fuel) service.
8. The permittee shall collect and record the following information each month for all liquid materials containing any HAP:
- a) The identification of any liquid materials that contains HAP;
 - b) The individual HAP composition each liquid material;
 - c) The throughput, in gallons, of each liquid material;
 - d) The individual HAP emissions rate for all liquid materials, in pounds or tons, per month (calculated using the formulas listed in U.S. EPA reference document AP-42, Sections 5.2 and 7.1 for each individual HAP);
 - e) The rolling 12-month total individual HAP emissions, in tons, (the sum of the actual emissions from 4.d) for the previous 12 months); and
 - f) The rolling 12-month total combined HAP emissions, in tons, (the sum of all the individual HAP emissions 4.e) for the previous 12 months).



9. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring and record keeping in this permit:
- a) all exceedances of the rolling, 12-month emission limitation for each individual HAP;
 - b) all exceedances of the rolling, 12-month emission limitation for combined HAP;
 - c) the probable cause of each deviation (excursion);
 - d) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e) 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 Director (the appropriate District Office or local air agency).

10. The permittee shall also submit annual reports that specify the total individual HAP and combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
11. Compliance with the emission limitations in B.7. shall be determined in accordance with the following methods:
- a) Emissions Limitation:
The individual HAP emissions from the facility shall not exceed 9.9 tons on a rolling 12-month basis.
Applicable Compliance Method:
Compliance shall be based on the record keeping specified in B.8. for each individual HAP.
 - b) Emissions Limitation:
The combined HAP emissions from the facility shall not exceed 24.9 tons on a rolling 12-month basis.
Applicable Compliance Method:
Compliance shall be based on the record keeping specified in B.8. for the combination of all HAPs.



Draft Permit-to-Install and Operate

CITGO Holding Terminals LLC.

Permit Number: P0118278

Facility ID: 0857040915

Effective Date: To be entered upon final issuance

12. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



Draft Permit-to-Install and Operate
CITGO Holding Terminals LLC.
Permit Number: P0118278
Facility ID: 0857040915
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Bulk Gasoline Terminal Loading Rack with Vapor Combustion Unit

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)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 0.0034 pound per 1,000 gallons of fuel loaded (4 milligrams per liter).</p> <p>The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.084 pound per 1,000 gallons of fuel loaded (10 milligrams per liter).</p> <p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.084 pound per 1,000 gallons of fuel loaded (10 milligrams per liter).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD and	The volatile organic compound (VOC) emissions from this emissions unit shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Title V)	not exceed 0.084 pound per 1,000 gallons of fuel loaded (10 milligrams per liter). See Sections B.3. through B.11., b)(2)a. and c)(1).
c.	OAC rule 3745-21-09(Q)	The emissions limitations established according to this rule are less stringent than the emissions limitations established according to OAC rule 3745-31-05(D).
d.	OAC rule 3745-72-03(A)	See b)(2)b. and c)(9) through c)(14)

(2) Additional Terms and Conditions

- a. These emissions limitations are based on the performance guarantee for the John Zink enclosed flame vapor combustion unit (VCU) dated September 23, 2014.
- b. During the low Reid Vapor Pressure (R.V.P.) control period (time period beginning June 1 and ending September 15 of each year), no refiner, importer, distributor, reseller, carrier, retailer or wholesale purchaser-consumer shall sell, offer for sale, dispense, supply, offer for supply, or transport (for use in a low R.V.P. control area) gasoline that has a R.V.P. exceeding 7.8 pounds per square inch absolute (P.S.I.) in the Dayton Area, (defined as Montgomery, Miami, Greene and Clark counties).

c) Operational Restrictions

- (1) The liquid fuel throughput for the loading rack shall not exceed:

Liquid Fuel	Volume (gallons on a rolling 12-month basis)
Gasoline and Ethanol combined	400,000,000
Distillate (diesel fuel and kerosene)	500,000,000

- (2) 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.



- (3) 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.
- (4) 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.
- (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (6) 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.
- (7) 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.
- (8) The pilot flame of the VCU shall be maintained at all times during the loading of gasoline (including gasoline, ethanol and gasoline additives) or distillates (i.e., diesel or diesel additives).
- (9) Each time that the physical custody or title of low R.V.P. gasoline changes hands (excluding when gasoline is sold or dispensed for use in motor vehicles at a retail outlet or wholesale purchaser-consumer facility), the transferor shall provide to the transferee, on or in addition to normal bills of lading, invoices, and the like, a document containing information regarding that shipment. This document shall accompany every shipment of gasoline after it has been dispensed or sold. The document shall contain, at a minimum, the following information:
 - a. The date of transfer.
 - b. The volume of the gasoline being transferred.
 - c. If the gasoline is ethanol blended, the percentage by volume of ethanol in the gasoline.
 - d. The location of the gasoline at the time of the transfer.
 - e. A statement certifying that the gasoline has an R.V.P. of 7.8 P.S.I. or less, except as provided in rule 3745-72-07 of the Administrative Code.



- (10) No person in the gasoline distribution network may sell, dispense or transfer low R.V.P. gasoline intended for use in a low R.V.P. control area without transfer documents that accurately contain the information listed in c)(9).
 - (11) A terminal operator who sells or dispenses gasoline intended for use in a low R.V.P. control area during the low R.V.P. control period may not accept gasoline into the terminal or dispense gasoline unless all of the following requirements are met:
 - a. Transfer documentation that accompanies the low R.V.P. gasoline contains the information listed in c)(9).
 - b. The terminal owner or operator conducts a quality assurance program including, but not limited to, periodic product sampling and testing in accordance with 40 CFR 80.8 and OAC rule 3745-72-08.
 - c. Low R.V.P. gasoline is segregated from conventional gasoline.
 - d. Clearly marked documents accompany the conventional gasoline labeling it as "conventional gasoline, not for sale to the ultimate consumer in a low R.V.P. control area."
 - (12) During the low R.V.P. control period, no refiner, importer, ethanol blender, carrier, distributor, reseller, or person may sell, offer for sale, dispense, supply or offer for supply gasoline for use in a low R.V.P. control area that is represented as low R.V.P. gasoline if the gasoline does not meet the definition of low R.V.P. gasoline and is not accompanied by the statement required in c)(9)e.
 - (13) Gasoline containing ethanol may exceed the R.V.P. limit specified in b)(2)b by no more than one P.S.I. if the gasoline meets all of the following requirements:
 - a. The gasoline must contain denatured, anhydrous ethanol.
 - b. The concentration of the anhydrous ethanol, excluding the required denaturing agent, must be at least nine per cent and no more than ten per cent, by volume, of the gasoline.
 - c. The ethanol content of the gasoline shall be determined by use of one of the testing methodologies specified in 40 CFR 80.8. The maximum ethanol content of gasoline shall not exceed any applicable waiver conditions under section 211(f)(4) of the Clean Air Act.
 - (14) Each invoice, loading ticket, bill of lading, delivery ticket, and other document that accompanies a shipment of gasoline containing ethanol shall contain a statement that the gasoline being shipped contains ethanol and shall list the volume percentage of ethanol in that gasoline.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain the following monthly records for the loading rack:
 - a. The total gasoline and ethanol throughput (including other additives), in gallons;



- b. The VOC emissions rate from gasoline and ethanol throughput (including other additives), in tons, calculated according to the formulas listed in U.S. EPA reference document AP-42, Section 5.2;
 - c. The rolling 12-month total gasoline and ethanol throughput (including other additives), in gallons, (the sum of the monthly gasoline throughput rates for the previous 12-months);
 - d. The rolling 12-month VOC emissions rate from gasoline and ethanol throughput (including other additives), in tons, (the sum of the monthly VOC emissions rates for the previous 12-months);
 - e. the total distillate throughput, in gallons;
 - f. The VOC emissions rate from distillate loading, in tons, calculated according to the formulas listed in U.S. EPA reference document AP-42, Section 5.2;
 - g. The rolling 12-month total distillate throughput, in gallons, (the sum of the monthly gasoline throughput rates for the previous 12-months);
 - h. The rolling 12-month VOC emissions rate from distillate loading, in tons, (the sum of the monthly VOC emissions rates for the previous 12-months);
- (2) 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).
- (3) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the lower explosive limit (LEL) as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (4) The loading rack, its vapor capture system and the VCU shall be interlocked so that fuel loading cannot occur unless the vapor capture system and VCU are operating. The permittee shall install, operate and maintain a heat sensing device (e.g., ultraviolet detector or thermocouple) to indicate the presence of a pilot flame when the emissions unit is operation. The monitoring device shall be installed, calibrated and maintained in accordance with the manufacturers recommendations, instructions and operating manuals. The permittee shall inspect the pilot flame and sensing device on a weekly basis.
- (5) The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the VCU which has been approved by the Regional Air Pollution Control Agency. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of a VCU. The



resultant report shall be maintained on site and shall be made available during subsequent inspections by the Regional Air Pollution Control Agency.

- (6) The permittee shall collect and record the following information each day:
- a. The results of any pilot inspection;
 - b. A description of any failures of the flame detection system;
 - c. If a failure of the flame detection system is detected, the periods of time when gasoline was loaded until the system is repaired;
 - d. A log of the operating time for the:
 - i. Loading Rack
 - ii. Capture (collection) system,
 - iii. VCU; and
 - iv. Monitoring equipment

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify 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:
- a. Any exceedances of the rolling 12-month combined gasoline and ethanol throughput limitation;
 - b. Any exceedances of the rolling 12-month distillate throughput limitation;
 - c. the probable cause of each deviation (excursion);
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e. 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.

- (2) 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 (the appropriate Ohio EPA District Office or local air agency) 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.



- (3) The permittee shall submit annual reports that summarize the following information:
- a. the total annual gasoline throughput rate, in gallons;
 - b) the total annual distillate throughput rate, in gallons;
 - c) the total annual ethanol throughput rate, in gallons;
 - d) the total annual VOC emissions, in tons;

These reports shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:

a. Emissions Limitation -

VOC emissions from the vapor control system shall not exceed 0.084 pound of VOC per 1000 gallons (10 milligrams of VOC per liter) of fuel loaded into the delivery vessel.

Applicable Compliance Method -

Compliance with the 0.084 lb VOC/1000 gallons of gasoline loaded emission limitation above shall be based upon the results of emission tests conducted in accordance with the procedures outlined in f)(2) of this permit.



b. Emission Limitation –

The NO_x emissions from this emissions unit shall not exceed 0.0034 pound per 1,000 gallons of fuel loaded (4 milligrams per liter).

Applicable Compliance Method -

Compliance shall be based on continued operation of the VCU following the manufacturer's instructions and maintenance recommendations.

If requested, compliance shall be demonstrated in accordance with emissions test conducted according U.S. EPA Reference Method 7 of 40 CFR Part 60, Appendix A.

c. Emission Limitation –

The CO emissions from this emissions unit shall not exceed 0.084 pound per 1,000 gallons of fuel loaded (10 milligrams per liter).

Applicable Compliance Method -

Compliance shall be based on continued operation of the VCU following the manufacturer's instructions and maintenance recommendations.

If requested, compliance shall be demonstrated in accordance with emissions test conducted according U.S. EPA Reference Method 10 of 40 CFR Part 60, Appendix A.

(2) 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 270 days after completing final installation of the VCU and on a recurring five (5) year basis thereafter.
- b. The emission testing shall be conducted to demonstrate compliance with the emissions limitation of 0.084 pound of VOC per 1000 gallons (10 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.
- c. The emission test must be completed in accordance with OAC rule 3745-21-10(E) and the testing requirements of 40 CFR Part 60, Subpart XX.
- d. Not later than 60 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).



Draft Permit-to-Install and Operate

CITGO Holding Terminals LLC.

Permit Number: P0118278

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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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.