



4/14/2015

Certified Mail

Mrs. Karen Fulton
 CITGO PETROLEUM - Tallmadge Terminal
 1595 Southeast Ave.
 Tallmadge, OH 44278

No	TOXIC REVIEW
No	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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
 Facility ID: 1677120030
 Permit Number: P0118483
 Permit Type: Renewal
 County: Summit

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 Akron Regional Air Quality Management District at (330)375-2480 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: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO PETROLEUM - Tallmadge Terminal**

Facility ID:	1677120030
Permit Number:	P0118483
Permit Type:	Renewal
Issued:	4/14/2015
Effective:	4/14/2015
Expiration:	4/14/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
CITGO PETROLEUM - Tallmadge Terminal

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Authorization

Facility ID: 1677120030
Application Number(s): A0052824
Permit Number: P0118483
Permit Description: Renewal FEPTIO for a petroleum loading rack, one (1) fixed roof storage tank and six (6) internal floating roof storage tanks.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/14/2015
Effective Date: 4/14/2015
Expiration Date: 4/14/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CITGO PETROLEUM - Tallmadge Terminal
1595 SOUTHEAST AVE.
TALLMADGE, OH 44278

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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: P0118483
 Permit Description: Renewal FEPTIO for a petroleum loading rack, one (1) fixed roof storage tank and six (6) internal floating roof storage tanks.

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: P0105893
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T007
 Company Equipment ID: Tank 9
 Superseded Permit Number: P0105893
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T009
 Company Equipment ID: Tank 5
 Superseded Permit Number: P0105893
 General Permit Category and Type: Not Applicable

Group Name: Group 1

Emissions Unit ID:	T001
Company Equipment ID:	Tank 1
Superseded Permit Number:	P0105893
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Tank 2
Superseded Permit Number:	P0105893
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Tank 3
Superseded Permit Number:	P0105893
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Tank 4
Superseded Permit Number:	P0105893
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Tank 8
Superseded Permit Number:	P0105893
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CITGO PETROLEUM - Tallmadge Terminal
Permit Number: P0118483
Facility ID: 1677120030
Effective Date: 4/14/2015

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
CITGO PETROLEUM - Tallmadge Terminal
Permit Number: P0118483
Facility ID: 1677120030
Effective Date: 4/14/2015

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) 1.c), 1.d), 1.e), 1.f) and 1.g).
 - c) The 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) 95.0 tons of volatile organic compounds (VOC) per year;
 - (2) 9.0 tons of any individual HAP per year; and
 - (3) 24.0 tons of combined hazardous air pollutants (HAPs) per year.
 - d) Compliance with the emission limitations as stated in 1.c) above shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface) and distillates (i.e., kerosene and diesel fuel) from the petroleum loading rack (J001). The annual throughputs of gasoline and distillates shall not exceed 288,857,529.6 gallons and 350,400,000 gallons, respectively, based upon rolling, 12-month summations of the throughputs.
 - e) The permittee shall maintain monthly records of the following information:
 - (1) the total, individual throughputs of gasoline and distillates from emissions unit J001, in gallons;
 - (2) the rolling, 12-month summations of the total individual throughputs of gasoline and distillates, in gallons;and
 - (3) the calculated, total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates for all emissions units at the facility, in tons.
 - f) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (1) 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. the rolling, 12-month gasoline throughput limitation, for emissions unit J001;



- b. the rolling, 12-month distillates throughput limitation, for emissions unit J001;
 - c. the rolling, 12-month VOC emission limitation of 95.0 tons;
 - d. the rolling, 12-month individual HAP emissions limitation of 9.0 tons; and
 - e. the rolling, 12-month combined HAPs emissions limitation of 24.0 tons.
- (2) the probable cause of each deviation (excursion);
- (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- (4) 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 the Director (the appropriate District Office or local air agency).

- g) Compliance with the emission limitations in 1.c) above shall be determined in accordance with the following method(s)

(1) Emission Limitation:

95 tons per year of VOC as a rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to 1.e) above.

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

- a. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's TANKS program.
- b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- c. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.
- d. The VOC emissions from gasoline 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 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

- e. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.

(2) Emission Limitations:

9.0 tons per year of any individual HAP as a rolling, 12-month summation from all facility emissions units

24.0 tons per year of combined HAPs as a rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with these emission limitations shall be based upon the records required pursuant to 1.e) above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility-supplied emission factors as follows:

For Gasoline:

- a. benzene - 0.00399 pound of benzene emissions per pound of VOC emissions
- b. ethyl benzene - 0.000516 pound of ethyl benzene emissions per pound of VOC emissions
- c. hexane - 0.00356 pound of hexane emissions per pound of VOC emissions
- d. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions (only for reformulated gasoline)
- e. toluene - 0.00523 pound of toluene emissions per pound of VOC emissions
- f. xylene - 0.00237 pound of xylene emissions per pound of VOC emissions
- g. 1,2,4-trimethylbenzene - 0.000558 pound of 1,2,4-trimethylbenzene emissions per pound of VOC emissions
- h. isooctane – 0.00442 pound of isooctane per pound of VOC emissions
- i. isopropyl benzene – 0.000136 pound of isopropyl benzene per pound of VOC emissions
- j. cyclohexane – 0.000552 pound of cyclohexane per pound of VOC emissions



Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards" EPA-453/R-94-002a, dated January 1994.

For Distillates:

- k. benzene - 0.000113 pound of benzene emissions per pound of VOC emissions
- l. ethyl benzene - 0.000113 pound of ethyl benzene emissions per pound of VOC emissions
- m. hexane - 0.00046 pound of hexane emissions per pound of VOC emissions
- n. toluene - 0.0101 pound of toluene emissions per pound of VOC emissions
- o. xylene - 0.0254 pound of xylene emissions per pound of VOC emissions
- p. 1,2,4-trimethylbenzene - 0.0237 pound of 1,2,4-trimethylbenzene emissions per pound of VOC emissions

Emission factors are derived from using the speciation option of USEPA's TANKS program.

For Additive:

- q. xylyene - 0.388 pound of xylene emissions per pound of VOC emissions
- r. ethyl benzene - 0.083 pound of ethyl benzene emissions per pound of VOC emissions
- s. naphthalene - 0.001 pound of naphthalene emissions per pound of VOC emissions

Emission factors are derived from using the speciation option of USEPA's TANKS program.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District (ARAQMD), and the CITGO Petroleum Corporation.

- h) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBBBB, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. At this time, the Ohio EPA is not accepting delegation for area sources subject to the Maximum Achievable Control Technology NESHAP (MACT) rules. The requirements of this rule, that are applicable to the area sources (for hazardous air pollutants) identified in this permit (J001, T001, T002, T003, T004, T005, and T009), shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (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.

- i) 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.



Final Permit-to-Install and Operate
CITGO PETROLEUM - Tallmadge Terminal
Permit Number: P0118483
Facility ID: 1677120030
Effective Date: 4/14/2015

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

petroleum loading rack with three bays, fourteen loading arms, and a vapor recovery 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. d)(11), d)(12), d)(13), d)(14), and e)(3).
 - (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)c.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(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. 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)	Total organic compounds (TOC) emissions shall not exceed 68.35 pounds per hour from the vapor collection system. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q), OAC rule 3745-31-05(D) and 40 CFR Part 60, Subpart XX.
b.	OAC rule 3745-21-09(Q)	The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to 40 CFR Part 60, Subpart XX. See b)(2)a. through b)(2)d. below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart R)	See 1.c) through 1.g) of Section B - Facility-Wide Terms and Conditions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 60, Subpart XX	<p>This emissions unit shall be equipped with a vapor collection system designed to collect the TOC vapors displaced from tank trucks during product loading.</p> <p>The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 mg of TOC per liter of gasoline loaded.</p>
e.	OAC rule 3745-114-01	See d)(11) through d)(14) below.

(2) Additional Terms and Conditions

- a. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - i. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - ii. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- b. The loading rack shall be equipped with a vapor control system whereby:
 - i. all vapors collected by the vapor collection system are vented to the vapor control system; and
 - ii. 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.
- c. 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.
- d. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

c) Operational Restrictions

- (1) The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- (2) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection 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.

- (3) The vapor collection system shall be designed to prevent any TOC vapors collected at one loading rack from passing to another loading rack.
- (4) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using all of the following procedures:
 - a. The permittee shall obtain the vapor tightness documentation described in d)(5) below for each gasoline tank truck which is to be loaded at the facility.
 - b. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded.
 - c. The permittee shall cross-check each tank identification number, obtained in accordance with c)(4)b. above, with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained.
 - i. if less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - ii. if less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

If either the quarterly or semiannual cross-check provided in c)(4)c.i. through c)(4)c.ii. above reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.
 - d. The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded within 1 week of the document cross-check in c)(4)c. above.
 - e. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded until vapor tightness documentation for that tank is obtained.
 - f. Alternate procedures to those described in c)(4)a. through c)(4)e. above for limiting gasoline tank truck loadings may be used upon application to, and approval by, Akron Regional Air Quality Management District (Akron RAQMD).
- (5) The permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- (6) The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions



to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks.

- (7) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in section 60.503(d) of 40 CFR Part 60, Subpart XX.
- (8) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).
- (9) The following vapor recovery unit (VRU) parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:
 - a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;
 - b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;
 - c. to ensure a proper flow of gasoline to the absorber nozzle when the vapor recovery unit is operating, a differential pressure of 59 inches of water column or greater shall be maintained across the orifice plate, located in the gasoline supply line to the absorber tower nozzle; and
 - d. to ensure proper adsorption, the carbon bed temperatures, at all levels, shall not exceed 150 degrees F.

Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

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

- (1) The permittee shall implement a preventive maintenance program (PMP) for the McGill VRU which has been submitted to the Akron RAQMD. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspection by the Akron RAQMD.
- (2) The permittee shall maintain the data required by the "McGill Daily Operating Check Sheet" on a daily basis, Monday through Friday excluding holidays. The permittee shall submit any subsequent changes to this check sheet to Akron RAQMD within 30 days prior to implementing these changes. The changes to this check sheet shall be mutually agreeable to CITGO Petroleum Corporation and Akron RAQMD.
- (3) The permittee shall collect and record the following information for each day, Monday through Friday excluding holidays:



- a. a log of the downtime, including the date, duration and reason for the downtime, for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the gasoline supply temperature in degrees F;
 - d. the differential pressure across the orifice plate in inches of water column;
 - e. the carbon bed temperatures in degrees F; and
 - f. the pressure in the vapor collection system, in inches of water gauge pressure.
- (4) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for TOC liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.
- (5) The tank truck vapor tightness documentation required under c)(4)a. above shall be kept on file at the terminal in a permanent form available for inspection.
- (6) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information:
- a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27);
 - b. tank owner and address;
 - c. tank identification number;
 - d. testing location;
 - e. date of test;
 - f. tester name and signature;
 - g. name, signature, and affiliation of witnessing inspector, if any; and
 - h. test results, including the actual pressure change in 5 minutes, in mm of water (average for 2 runs).
- (7) A record of each monthly leak inspection required under d)(4) above shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:



- a. date of inspection;
 - b. findings (may include no leaks discovered, or the location, nature and severity of each leak);
 - c. leak determination method;
 - d. corrective action taken, including the date each leak was repaired and the reason for any repair interval in excess of 15 days; and
 - e. inspector name and signature.
- (8) The permittee shall keep documentation of all notifications required under c)(4)d. above on file at the terminal for at least 2 years.
- (9) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in d)(5), d)(7), and d)(8) above, the permittee may comply with the requirements in either d)(9)a. or d)(9)b. below.
- a. An electronic copy of each record is instantly available at the terminal.
 - i. The copy of each record in d)(9)a. above is an exact duplicate image of the original paper record with certifying signatures.
 - ii. The permitting authority is notified in writing that each terminal using this alternative is in compliance with d)(9)a. above.
 - b. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.
 - i. The copy of each record in d)(9)b. above is an exact duplicate image of the original paper record with certifying signatures.
 - ii. The permitting authority is notified in writing that each terminal using this alternative is in compliance with d)(9)b. above.
- (10) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.
- (11) The permit-to-install (PTI) application for this emissions unit, J001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable



Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: methyl tert-butyl ether (MTBE)

TLV (mg/m³): 180

Maximum Hourly Emission Rate (lbs/hr): 1.59*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1100

MAGLC (ug/m³): 4285.7

Toxic Contaminant: hexane

TLV (mg/m³): 176



Maximum Hourly Emission Rate (lbs/hr): 0.36*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 275

MAGLC (ug/m3): 4190.5

Toxic Contaminant: toluene

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 0.30*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 220

MAGLC (ug/m3): 1785.7

The permittee, has demonstrated that emissions of MTBE, hexane, and toluene, from emissions unit J001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (12) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level



concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (14) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) 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.
 - (2) 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.
 - (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-



level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emission unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to permit expiration, during the summer months when the gasoline vapor pressure is highest.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of total organic compounds from gasoline loading.
 - c. The following test methods and procedures of 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable mass emission rate for TOC:

Method 2A inlet vapor volume

Method 21 potential leak sources

Method 25A or 25B TOC concentration

Testing shall be performed in accordance with the requirements of 40 CFR 60.503 and OAC rule 3745-21-10(E).

Methods in section 60.503(d) of 40 CFR Part 60, Subpart XX shall be employed to determine the gauge pressure in the delivery truck during product load.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission 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 Akron RAQMD's refusal to accept the results of the emission test(s).
- (3) Personnel from the Akron RAQMD 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 testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- (4) 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 Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional



time for the submittal of the written reports, where warranted, with prior approval from the Akron RAQMD.

- (5) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

35 mg of TOC per liter of gasoline loaded

Applicable Compliance Method:

Compliance with the allowable mass emission rate for TOC above shall be demonstrated through emission testing as required in f)(1) through f)(4) above.

b. Emission Limitation:

68.35 pounds of TOC per hour from the vapor collection system

Applicable Compliance Method:

Compliance with the hourly allowable TOC emission limitation above shall be demonstrated by multiplying the allowable emission rate of 35 mg of TOC per liter of gasoline loaded by the maximum liters of gasoline load per hour.

If required, the permittee shall demonstrate compliance with the allowable hourly TOC emission rate based on the results of emissions testing as required in f)(1) through f)(4) above.

g) Miscellaneous Requirements

- (1) None.



2. T007, Tank 9

Operations, Property and/or Equipment Description:

7,761 gallon fixed roof storage tank - Tank 9

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)c.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operations(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. 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)	Volatile organic compounds (VOC) shall not exceed 0.02 pound per hour. See b)(2)a. below.
b.	OAC rule 3745-21-09(L)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(a).
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart R)	See 1.c) through 1.g) of Section B - Facility-Wide Terms and Conditions.

(2) **Additional Terms and Conditions**

a. Use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) 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.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.02 pound of VOC per hour

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation above shall be demonstrated using the most recent version of USEPA's TANKS program.
- g) Miscellaneous Requirements
 - (1) None.



3. T009, Tank 5

Operations, Property and/or Equipment Description:

3,062,808 gallon storage tank with an internal floating roof - Tank 5

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)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	Volatile organic compounds (VOC) shall not exceed 8.01 tons per year.
b.	OAC rule 3745-21-09(L)	The requirements specified by this rule are equivalent to or less stringent than the requirements established pursuant to 40 CFR Part 60, subpart Kb.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart R)	See 1.c) through 1.g) of Section B - Facility-Wide Terms and Conditions.
d.	40 CFR Part 60, Subpart Kb	See b)(2)a. below.

(2) Additional Terms and Conditions

a. The permittee shall equip this storage vessel with the following: 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) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For the control equipment required to meet b)(2)a. above (permanently affixed roof and internal floating roof), the permittee shall:
 - a. 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, 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 term and condition 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 Administrator in the inspection report required in section 60.115b(a)(3) of 40 CFR Part 60, Subpart Kb. 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 b)(2)a.ii.(b) above:
 - i. Visually inspect the vessel as specified in d)(1)d. below at least every 5 years; or
 - ii. Visually inspect the vessel as specified in d)(1)b. above.



- d. 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 permittee shall repair the items as necessary so that none of the conditions specified in this term and condition 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 d)(1)b. and d)(1)c.ii. above and at intervals no greater than 5 years in the case of vessels specified in d)(1)c.i. above.
- (2) The permittee shall keep a record of each inspection performed as required by d)(1)a., d)(1)b., d)(1)c., and d)(1)d. above. 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).
 - (3) The permittee shall maintain records of the following information:
 - a. The volatile organic liquid (VOL) stored in the tank;
 - b. The period of storage; and
 - c. The maximum true vapor pressure of the VOL during the respective storage period. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined 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 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.
 - iii. For other liquids, the vapor pressure:
 - (a) May be obtained from standard reference texts, or
 - (b) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see §60.17); or
 - (c) Measured by an appropriate method approved by the Director; or
 - (d) Calculated by an appropriate method approved by the Director.
 - (4) The permittee shall keep copies of all records required in d)(2) and d)(3) above for at least 2 years.
 - (5) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage vessel.
- e) Reporting Requirements
 - (1) Notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(1)a. and d)(1)d. above to afford the Director the opportunity to have an observer present. If the inspection required by d)(1)d. above 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 the Director 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 the Director at least 7 days prior to the refilling.
 - (2) After installing control equipment in accordance with b)(2)a. above (fixed roof and internal floating roof), the permittee shall furnish the Director with a report that describes the control equipment and certifies that the control equipment meets the specifications of b)(2)a. and d)(1)a. above. This report shall be an attachment to the notification required by section 60.7(a)(3) of 40 CFR Part 60, Subpart A.
 - (3) If any of the conditions described in d)(1)b. above are detected during the annual visual inspection required by d)(1)b. above, a report shall be furnished to the Director 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.
 - (4) After each inspection required by d)(1)c. above 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 d)(1)c.ii. above, a report shall be furnished to the Director within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)a. or d)(1)c. above and list each repair made.

- (5) The permittee shall keep copies of all reports required in e)(2) through e)(4) above for at least 2 years.
 - (6) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.01 tons of VOC per year

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated using the most recent version of USEPA's TANKS program.
- g) Miscellaneous Requirements
- (1) None.



4. Emissions Unit Group - Group 1: T001, T002, T003, T004, T005

EU ID	Operations, Property and/or Equipment Description
T001	522,522 gallon storage tank with an internal floating roof - Tank 1
T002	521,388 gallon storage tank with an internal floating roof - Tank 2
T003	1,198,134 gallon storage tank with an internal floating roof - Tank 3
T004	1,226,316 gallon storage tank with an internal floating roof - Tank 4
T005	94,752 gallon storage tank with an internal floating roof - Tank 8

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 operations(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. 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 3745-21-09(L)	See b)(2)a. through b)(2)c. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart R)	See 1.c) through 1.g) of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

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



- c. 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- 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 liquid that has a maximum true vapor pressure greater than 1.0 pound 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 in 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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.

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. None.

g) Miscellaneous Requirements

- (1) None.