Facility ID: 1318005897 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Go to Part II for Emissions Unit J003
Go to Part II for Emissions Unit P002

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Facility ID: 1318005897 Emissions Unit ID: J002 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Tank truck loading rack which has 10 bottom loading arms for gasoline, ethanol, and distillates (distillate oil products) and 4 top submerged loading arms for distillates and calcium chloride solution in 4 bays. The VOC emissions generated by the operation of the bottom loading arms are controlled by an elevated flare vapor control unit. Counting from south to north: Bay 1 (southernmost) has 4 bottom loading arms, Bay 2 has 5 bottom loading arms, Bay 3 has 1 bottom loading arm and 1 top submerged loading arm for distillates and Bay 4 (northernmost) has 3 top submerged loading arms for calcium chloride solution and distillates.	OAC rule 3745-35-07	Gasoline loading: 0.292 pound of VOC per 1,000 gallons (35 mg/l) of gasoline loaded into the delivery vessel; 4.38 tons of VOC per year. Ethanol loading: 0.045 pound of VOC per 1,000 gallons (2.64 mg/l) of ethanol loaded into the delivery vessel; 2.25 tons of VOC per year. Distillates loading (diesel fuels, fuel oils, and kerosene): 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel; 0.95 ton of VOC per year. The total annual VOC emissions from this emissions unit shall not exceed 9.83 tons, as a rolling, 12-month summation. See A.2.a below.

2. **Additional Terms and Conditions**

(a) The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling, 12-month summations.

B. **Operational Restrictions**

1. Compliance with the emission limitations as stated in Section A shall be achieved by restricting the annual throughput of gasoline, ethanol, and distillates. The annual throughput of gasoline, ethanol, and distillates shall not exceed 30,000,000 gallons, 100,000,000 and 100,000,000 gallons, respectively. In order to ensure federal enforceability during the first 12 calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations, in gallons:
MAXIMUM ALLOWABLE CUMULATIVE THROUGHPUT FOR:
Month(s) gasoline ethanol distillates

1-1 2,500,000 8,333,333 8,333,333
1-2 5,000,000 16,666,667 16,666,667
1-3 7,500,000 25,000,000 25,000,000
1-4 10,000,000 33,333,333 33,333,333
1-5 12,500,000 41,666,667 41,666,667
1-6 15,000,000 50,000,000 50,000,000
1-7 17,500,000 58,333,333 58,333,333

1-8 20,000,000 66,666,667 66,666,667
1-9 22,500,000 75,000,000 75,000,000
1-10 25,000,000 83,333,333 83,333,333
1-11 27,500,000 91,666,667 91,666,667
1-12 30,000,000 100,000,000 100,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual gasoline, ethanol, and distillates throughput limitations shall be based upon rolling, 12-month summations.

2. The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any delivery vessel:

a. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.

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

3. b. The loading rack shall be equipped with a vapor control system whereby:

a. All vapors collected by the vapor collection system are vented to the vapor control system.

b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

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

5. All product 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 in sewers, stored in open containers or handled in any other manner that would result in evaporation.

7. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system which are employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100% of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

8. A pilot flame shall be maintained at all times in the flare's pilot light burner during the loading of products.

C. **Monitoring and/or Record Keeping Requirements**

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

a. The total, individual throughputs, in gallons, of gasoline, ethanol, and distillates for each month.

b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs, in gallons, of gasoline, ethanol, and distillates for each calendar month.

c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the total gasoline, ethanol, and distillates throughputs, in gallons.

d. The total emissions of VOC from this emissions unit, in tons.

e. The total emissions of each individual HAP from all emissions units at this facility, in tons.

f. The aggregate sum of all HAPs from all emissions units at this facility, in tons.

2. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare's pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. Each business day, the permittee shall verify that the flare's pilot flame and flame sensor are functioning properly when the emissions unit is in operation. The permittee shall record the results of the daily flare pilot flame and flame sensor inspections.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

b. The results of the flare pilot flame and flame sensor inspections conducted to verify that the flare's pilot flame and flame sensor are working when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall submit semi-annual deviation (excursion) reports which identify all exceedances of the following:

a. The rolling, 12-month limitations on the throughputs of gasoline, ethanol, and distillates.

b. For the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative throughput limits.

c. The rolling, 12-month emission limitation for VOC.

d. All periods during which the flare's pilot flame and flame sensor were not functioning properly when the emissions unit was in operation.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous 6-month calendar period.

2. The permittee shall submit annual reports of the total throughputs, in gallons, for gasoline, ethanol, and distillates and the total VOC emissions during the calendar year for this emissions unit, and the total individual HAP and combined HAP emissions for all emissions units at the facility. These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

2. Emission Limitation: 0.292 pound of VOC per 1,000 gallons of gasoline loaded

Emission Limitation: 0.045 pound of VOC per 1,000 gallons of ethanol loaded

Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through emission tests.

The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test, during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)

Within 12 months prior to the expiration of this permit, the permittee shall conduct or have conducted an emission test(s) for this emissions unit in order to demonstrate continuing compliance with the allowable VOC emission rate. This test shall be done between the months of May and September.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland 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 Cleveland Local Air Agency's refusal to accept the results of the emission test(s).
Personnel from the Cleveland 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Local Air Agency within 30 days following completion of the test(s).

3. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A, the permittee shall comply with the following:

a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."

b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

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

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

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

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

i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;

iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;

iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;

v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and

vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

viii. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions; and

ix. methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.

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

c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Cleveland Local Air Agency and Fleet Supplies, Inc.

F. **Miscellaneous Requirements**

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

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Facility ID: 1318005897 Emissions Unit ID: J003 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Tank truck loading rack which has 3 top submerged arms for loading volatile organic liquids (VOLs).	OAC rule 3745-35-07	Heptane loading: 0.95 pound of VOC per 1,000 gallons of heptane loaded into the delivery vessel; 0.48 ton of VOC per year. Toluene loading: 0.54 pound of VOC per 1,000 gallons of toluene loaded into the delivery vessel; 0.27 ton of VOC per year. Furfuryl alcohol loading: 0.01 pound of VOC per 1,000 gallons of furfuryl alcohol loaded into the delivery vessel; 0.01 ton of VOC per year. Generic VOL loading: 2.00 pounds of VOC per 1,000 gallons of VOL loaded into the delivery vessel; 1.0 ton of VOC per year. The total annual VOC emissions from this emissions unit shall not exceed 1.76 tons per year, as a rolling 12-month summation. See A.2.a below.

2. **Additional Terms and Conditions**

(a) The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling 12-month summations.

B. **Operational Restrictions**

1. Top submerged filling, as defined in OAC rule 3745-21-01(H)(13), shall be employed for all product loading at this emissions unit.

2. Compliance with the emission limitations as stated in Section A shall be achieved by restricting the annual throughputs of heptane, toluene, furfuryl alcohol, and generic VOLs. The annual throughput of heptane, toluene, furfuryl alcohol, and generic VOLs shall not exceed 1,000,000 gallons, 1,0000,000 gallons, 1,0000,000 gallons, and 1,000,000 gallons, respectively. In order to ensure federal enforceability during the first 12 calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations, in gallons:
MAXIMUM ALLOWABLE CUMULATIVE THROUGHPUT FOR:

Month(s) heptane toluene furfuryl generic
.. alcohol VOLs

1-1 83,333 83,333 83,333 83,333
1-2 166,667 166,667 166,667 166,667
1-3 250,000 250,000 250,000 250,000
1-4 333,333 333,333 333,333 333,333
1-5 416,667 416,667 416,667 416,667
1-6 500,000 500,000 500,000 500,000
1-7 583,333 583,333 583,333 583,333
1-8 666,667 666,667 666,667 666,667
1-9 750,000 750,000 750,000 750,000
1-10 833,333 833,333 833,333 833,333
1-11 916,667 916,667 916,667 916,667
1-12 1,000,000 1,000,000 1,000,000 1,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual heptane, toluene, furfuryl alcohol, and generic VOLs throughput limitations shall be based upon rolling, 12-month summations.

C. **Monitoring and/or Record Keeping Requirements**

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

a. The total, individual throughputs, in gallons, of heptane, toluene, furfuryl alcohol, and generic VOLs for each month.

b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs, in gallons, of heptane, toluene, furfuryl alcohol, and generic VOLs for each calendar month.

c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the total heptane, toluene, furfuryl alcohol, and generic VOLs throughputs, in gallons.

d. The total emissions of VOC from this emissions unit, in tons.

e. The total emissions of each individual HAP from all emissions units at this facility, in tons.

f. The aggregate sum of all HAPs from all emissions units at this facility, in tons.

D. **Reporting Requirements**

1. The permittee shall submit semi-annual deviation (excursion) reports which identify all exceedances of the following:

a. The rolling, 12-month limitations on the throughputs of heptane, toluene, furfuryl alcohol, and generic VOLs.

b. For the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative throughput limits.

c. The rolling, 12-month emission limitation for VOC.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous 6-month calendar period.

2. The permittee shall submit annual reports of the total throughput, in gallons, for heptane, toluene, furfuryl alcohol, and generic VOLs and the total VOC emissions during the calendar year for this emissions unit, and the total individual HAP and combined HAP emissions for all emissions units at the facility. These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A, the permittee shall comply with the following:

a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."

b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test

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

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

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

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

i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;

iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;

iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;

v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and

vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

viii. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions; and

ix. methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.

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

c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Cleveland Local Air Agency and Fleet Supplies, Inc.

F. **Miscellaneous Requirements**

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

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Facility ID: 1318005897 Emissions Unit ID: P002 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Barge loading operation for gasoline, kerosene and distillate oil products.	OAC rule 3745-35-07	Gasoline loading: 3.35 pound of VOC per 1,000 gallons of gasoline loaded into the barge; 16.75 tons of VOC per year.

Kerosene loading:
0.019 pound of VOC per 1,000 gallons of kerosene loaded into the barge; 0.95 ton of VOC per year.

Distillates loading:
0.014 pound of VOC per 1,000 gallons of distillates loaded into the barge; 0.60 ton of VOC per year.

The total annual VOC emissions from this emissions unit shall not exceed 18.40 tons per year, as a rolling, 12-month summation.

See A.2.a below.

2. **Additional Terms and Conditions**

(a) The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling 12-month summations.

B. **Operational Restrictions**

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting the annual throughput of gasoline, kerosene, and distillates. The annual throughput of gasoline, kerosene, and distillates shall not exceed 10,000,000 gallons, 100,000,000 gallons, and 100,000,000 gallons, respectively. In order to ensure federal enforceability during the first 12 calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations, in gallons:

MAXIMUM ALLOWABLE CUMULATIVE THROUGHPUT FOR:

Month(s)	Gasoline	Kerosene	Distillates
1-1	833,333	8,333,333	8,333,333
1-2	1,666,667	16,666,667	16,666,667
1-3	2,500,000	25,000,000	25,000,000
1-4	3,333,333	33,333,333	33,333,333
1-5	4,166,667	41,666,667	41,666,667
1-6	5,000,000	50,000,000	50,000,000
1-7	5,833,333	58,333,333	58,333,333
1-8	6,666,667	66,666,667	66,666,667
1-9	7,500,000	75,000,000	75,000,000
1-10	8,333,333	83,333,333	83,333,333
1-11	9,166,667	91,666,667	91,666,667
1-12	10,000,000	100,000,000	100,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual gasoline, kerosene, and distillates throughput limitations shall be based upon rolling, 12-month summations.

2. Top submerged filling, as defined in OAC rule 3745-21-01(H)(13), shall be employed for all product loading at this emissions unit.

3. Gasoline shall only be loaded between the hours of 6:00 p.m. and 6:00 a.m. for the period of April 1 to October 31. The unfinished gasoline loading continuing into the following day will be stopped, if the ambient air ozone level exceeds 80 at the nearest ozone index monitor.

4. Gasoline loading is limited to a maximum of 84,000 gallons per minute and 1,050,000 gallons per barge load.

5. No odorous materials will be allowed for loading.

6. No benzene service, as defined in 40 CFR Part 61, will be allowed.

C. **Monitoring and/or Record Keeping Requirements**

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

a. The total, individual throughputs, in gallons, of gasoline, kerosene, and distillates for each month.

b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs, in gallons, of gasoline, kerosene, and distillates for each calendar month.

c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the total gasoline, kerosene, and distillates throughputs, in gallons.

d. The total emissions of VOC from this emissions unit, in tons.

e. The total emissions of each individual HAP from all emissions units at this facility, in tons.

f. The aggregate sum of all HAPs from all emissions units at this facility, in tons.

D. **Reporting Requirements**

1. The permittee shall submit semiannual deviation (excursion) reports which identify all exceedances of the following:

a. The rolling, 12-month limitations on the throughputs of gasoline, kerosene, and distillates.

b. For the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative throughput limits.

c. The rolling, 12-month emission limitation for VOC.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous 6-month calendar period.

2. The permittee shall submit annual reports of the total throughput, in gallons, for gasoline, kerosene, and distillates and the total VOC emissions during the calendar year for this emissions unit, and the total individual HAP and combined HAP emissions for all emissions units at the facility. These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A, the permittee shall comply with the following:

a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."

b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

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

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

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

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

i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;

iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;

iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;

v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and

vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

viii. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions; and

ix. methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.

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

c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Cleveland Local Air Agency and Fleet Supplies, Inc.

F. **Miscellaneous Requirements**

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