



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

11/20/2015

Certified Mail

Mike Kolovich
 Buckeye Terminals, LLC - CANTON TERMINAL
 993 Brodhead Road Ste 100
 Moon Township, PA 15108

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	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: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576050275
 Permit Number: P0115045
 Permit Type: Renewal
 County: Stark

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Canton Repository. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Canton City Health Department
 Permit Review/Development Section 420 Market Avenue
 Ohio EPA, DAPC Canton, OH 44702-1544
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

Michael E. Hopkins, P.E.
 Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
 Canton; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Buckeye Terminals, LLC – Canton Terminal is a bulk gasoline terminal located in Canton, OH. Operations at the facility include one loading rack and numerous storage tanks.

3. Facility Emissions and Attainment Status:

Buckeye Terminals is located in Stark County which is designated as attainment for all criteria pollutants.

Total Facility-wide VOC emissions:	86.62 tons/yr
Total Facility-wide HAPs emissions:	6.91 tons/yr
De Minimis/Exempt emissions:	6.41 tons/yr

4. Source Emissions:

No physical or operational changes are occurring at the facility. The facility has requested federally enforceable synthetic minor restrictions which will limit facility-wide volatile organic compounds (VOC) emissions to 90.13 tons per rolling, 12-month period and facility-wide hazardous air pollutant (HAP) emissions to 9.9 tons per rolling, 12-months period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs.

The facility has requested these restrictions to establish the potential to emit for the facility and to ensure emissions remain below the Title V and MACT applicability thresholds.

5. Conclusion:

With the federally enforceable synthetic minor restrictions in place, the facility will not trigger the thresholds for Title V or MACT.

6. Please provide additional notes or comments as necessary:

None.

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

Pollutant	Tons Per Year
VOC	90.13
Combined HAPs	24.90
Individual HAPs	9.90

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal

Buckeye Terminals, LLC - CANTON TERMINAL

807 HARTFORD AVE., Canton, OH 44707

ID#:P0115045

Date of Action: 11/20/2015

Permit Desc:Renewal FEPTIO for a petroleum bulk loading/storage terminal that establishes a facility-wide restriction on the potential to emit..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Marisa Toppi, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544. Ph: (330)489-3385



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals, LLC - CANTON TERMINAL**

Facility ID:	1576050275
Permit Number:	P0115045
Permit Type:	Renewal
Issued:	11/20/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



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

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Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0115045
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576050275
Application Number(s): A0048199, A0051615
Permit Number: P0115045
Permit Description: Renewal FEPTIO for a petroleum bulk loading/storage terminal that establishes a facility-wide restriction on the potential to emit.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/20/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Buckeye Terminals, LLC - CANTON TERMINAL
807 HARTFORD AVE
Canton, OH 44707

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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: P0115045

Permit Description: Renewal FEPTIO for a petroleum bulk loading/storage terminal that establishes a facility-wide restriction on the potential to emit.

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: P0101199
 General Permit Category and Type: Not Applicable

Emissions Unit ID: **T025**
 Company Equipment ID: Tank #37
 Superseded Permit Number: P0107284
 General Permit Category and Type: Not Applicable

Group Name: Tanks installed prior to 1973

Emissions Unit ID:	T001
Company Equipment ID:	Storage Tank #18
Superseded Permit Number:	P0075583
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Storage Tank #19
Superseded Permit Number:	P0075584
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Storage Tank #20
Superseded Permit Number:	P0075585
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T009
Company Equipment ID:	KEROSENE STORAGE TANK
Superseded Permit Number:	P0075590
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T015
Company Equipment ID:	SLOP STORAGE TANK
Superseded Permit Number:	P0075596
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T030
Company Equipment ID:	Tank 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0115045
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0115045
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2., B.3., B.4., B.5., and B.6.
2. This permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the facility. The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:
 - a) The total combined annual emissions from all facility emissions units at the facility, including exempt and “de minimis” emissions units, shall not exceed the following based upon a rolling, 12-month summation of the monthly emissions:
 - (1) VOC emissions shall not exceed 90.13 tons per year;
 - (2) total combined HAPs emissions shall not exceed 24.90 tons per year; and
 - (3) any individual HAP emissions shall not exceed 9.90 tons per year.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the emissions, upon issuance of this permit.
 - b) The permittee shall load and/or store petroleum-based products only.
3. The permittee shall collect and record the following VOC information each month for all emissions units at the facility:
 - a) the company identification of each petroleum liquid loaded or stored;
 - b) the calculated VOC emissions from all petroleum liquids loaded and/or stored in emissions units J001, T001, T002, T003, T009, T015, T025, and T030, combined, in tons;
 - c) the calculated VOC emissions from all petroleum liquids loaded and/or stored in “de minimis” and exempt emissions units, in tons;
 - d) the total VOC emissions from all petroleum liquids loaded and/or stored for all emissions units facility-wide combined, in tons [summation of term B.3.b) and B.3.c)]; and
 - e) the rolling, 12-month VOC emissions, in tons.

4. The permittee shall collect and record the following HAP information each month for all emissions units at the facility:
 - a) the company identification of each petroleum liquid loaded and/or stored;
 - b) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in emissions units J001, T001, T002, T003, T009, T015, T025, and T030, combined, in tons, based on the following:
 - (1) multiply the VOC emissions from term B.3.b) by the HAP emission factors obtained from AP-42, Section 7.14 Hazardous Air Pollutant Speciation Methodology (11/2006);
 - c) the total emission rate for each individual HAP from each petroleum liquid loaded and/or stored in “de minimis” and exempt emissions units, in tons, based on the following:
 - (1) multiply the VOC emissions form term B.3.c) above by the HAP emission factors obtained from AP-42 Section 7.14, Hazardous Air Pollutant Speciation Methodology (11/2006);
 - d) the total emission rate for each individual HAP from all petroleum liquids stored and/or loaded, in tons [summation of term B.4.b) and B.4.c)] and;
 - e) the total emission rate for combined HAPs from all petroleum liquids stored and/or loaded, in tons [summation of term B.4.d)]; and
 - f) the rolling 12-month individual HAP emissions and combined HAPs emissions, in tons.
5. The permittee shall submit quarterly deviation reports that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in the permit:
 - (1) the rolling, 12-month VOC emission limitation of 90.13 tons;
 - (2) the rolling, 12-month individual HAP emission limitation of 9.90 tons; and
 - (3) the rolling, 12-month total combined HAPs emission limitation of 24.90 tons.
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).

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



The quarterly reports shall be submitted 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 Canton City Health Department, Air Pollution Control Division.

6. Testing Requirements:

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

(1) Emission Limitation:

90.13 tons VOC per rolling 12-month period from all facility emission units

Applicable Compliance Method:

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

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

- i. VOC emissions from the storage tanks shall be determined using the most recent version of U.S. EPA's "TANKS" program of AP-42 Chapter 7: Liquid Storage Tanks;
- ii. the VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates";
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42 Chapter 7: Liquid Storage Tanks, Section 7.1.3.2.2: Roof Landings; and
- iv. the VOC emissions from gasoline, transmix, or distillate truck loading shall be determined using AP-42, Chapter 5: Petroleum Industry, Section 5.2.2.1.1 Loading Losses, the most recent emission test results for the control efficiency of the vapor control system, and a collection efficiency of 99%

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(2) Emission Limitation:

24.90 tons total combined HAPs per rolling, 12-month period from all facility emissions units

9.90 tons any individual HAP per rolling, 12-month period from all facility emissions units



Applicable Compliance Method:

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

7. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart BBBBBB, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA Region 5. The complete requirements of this Subpart (including 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 the Canton City Health Department, Air Pollution Control Division.
8. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0115045
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Gasoline/Distillate Truck Loading Rack with carbon adsorption/gasoline adsorption vapor recovery unit that has a minimum control efficiency of 93.9%. The loading rack consists of 6 loading bays.

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

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

a. None.

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

a. b)(1)a., b)(2)a., c)(1), d)(1) and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [FEPTIO to avoid Title V and MACT applicability]	<u>Volatile organic compound (VOC) emissions from gasoline loading shall not exceed:</u> 0.50 lb of VOC per 1,000 gals [60 milligrams of per liter (mg/l)] of gasoline loaded into the delivery vessel and 59.75 tons per year (tpy). <u>VOC emissions from distillate loading shall not exceed:</u> 0.019 lb of VOC per 1,000 gals of distillate loaded into the delivery vessel and 2.85 tpy.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Total annual VOC emissions from this emissions unit shall not exceed 62.60 tons per year. See Facility-wide Terms and Conditions Section B.
b.	OAC rule 3745-21-09(Q)	See b)(2)b. and c)(2) through (7).

(2) Additional Terms and Conditions

- a. This permit establishes the following terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:
 - i. the maximum annual throughput of gasoline shall not exceed 239,000,000 gallons per rolling, 12-month period;
 - ii. the maximum annual throughput of distillate (diesel fuels, fuel oils, and kerosene) shall not exceed 300,000,000 gallons per rolling, 12-month period; and
 - iii. the facility-wide terms and conditions established in Section B. of this permit.
- b. The emission limitation that VOC emissions shall not exceed 0.67 lb VOC per 1,000 gallons (80 mg/l) of gasoline loaded into the delivery vessel, as specified in OAC rule 3745-21-09(Q), is less stringent than the federally-enforceable emission limitation of 0.5 lb VOC/1,000 gals (60 mg/L) of gasoline loaded into the delivery vessel established in this permit for VOC pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The annual throughput of gasoline and distillate shall not exceed the following:
 - a. the maximum annual throughput of gasoline shall not exceed 239,000,000 gallons per rolling, 12-month period; and
 - b. the maximum annual throughput of distillate (diesel fuels, fuel oils, and kerosene) shall not exceed 300,000,000 gallons per rolling, 12-month period.
- (2) The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:

- a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- (3) The loading rack is 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) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (6) The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation.
- (7) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit of propane, as determined under paragraph (K) of OAC rule 3745-21-10.
- (8) The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 3% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation in term b)(1)a. (60 mg/l), but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.] Monitoring shall be conducted as detailed in term d)(2) and only if a CEMS has not been installed and certified, or is not operational.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records of the following information:
- a. the total throughput of gasoline for each month, in gallons;
 - b. the total throughput of distillate for each month, in gallons;
 - c. the rolling, 12-month summation of the monthly throughputs of gasoline, in gallons; and

- d. the rolling, 12-month summation of the monthly throughputs of distillates, in gallons.
- (2) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines with limitations established in term c)(8). The highest VOC concentration, as measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.

Once a VOC Continuous Emission Monitoring System (CEMS) is installed, certified, and operating in accordance with the quality assurance/quality control plan specified in term d)(3)a., the permittee is no longer required to monitor the VOC exhaust gas concentration on a monthly basis because VOC emissions shall be monitored and recorded on a continuous basis. In an event that the CEMS becomes non-operational, monitoring shall revert to Method 21 monitoring procedure for the period that the CEMS is non-operational.

- (3) If the permittee seeks to demonstrate compliance with term b)(1)a. through the use of a Continuous Emission Monitoring System (CEMS), the permittee shall satisfy the following requirements:
- a. Each continuous VOC monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9. At least 45 days before commencing certification testing of the continuous VOC monitoring system, the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of VOC emissions from the continuous monitor, in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous VOC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60, and to conduct relative accuracy test audits in units of the standard(s) in accordance with and at the frequencies required per 40 CFR Part 60.
 - b. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recordings/processing hardware and software.
- (4) Prior to the installation of the continuous VOC monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous VOC monitoring system meets the requirements of Performance Specification 8 or 9. Once received, the

letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Canton City Health Department, Air Pollution Control Division upon request.

The permittee shall also submit documentation supporting the proposed VOC detection method (flame ionization (FI), photoionization (PI), nondispersive infrared absorption (NDIR), gas chromatography (GC), or other detection principle) that is appropriate for the VOC species present in the emission gases and that meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9.

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

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

- a. emissions of VOC in parts per million (ppm) for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of VOC in units of the applicable standard(s) in the appropriate averaging period;
- c. results of the quarterly cylinder gas audits;
- d. results of daily zero-span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;
- h. the date, time and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous VOC monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in term d)(5)g. and h.

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

- (6) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (7) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC rule 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Canton City Health Department, Air Pollution Control Division, by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. the rolling, 12-month throughput restrictions on gasoline and distillate.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted electronically 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 Canton City Health Department, Air Pollution Control Division.

- (3) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Canton City Health Department, Air Pollution Control Division within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

- (4) If a CEMS is employed, the permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous VOC monitoring system:
- a. Pursuant to the monitoring, recordkeeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Canton City Health Department, Air Pollution Control Division, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the following:
 - i. the date of the exceedance;
 - ii. the commencement and completion times of the exceedance;
 - iii. the duration and magnitude of each exceedance; as well as,
 - iv. the reason (if known) and the corrective actions taken (if any) for each exceedance.

Excess emissions shall be reported in units of the applicable standard(s).

- b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous VOC and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total VOC emissions for the calendar quarter, in tons;
 - vi. the total operating time of the emission unit, in hours;
 - vii. the total operating rime of the continuous VOC monitoring system while the emission unit was in operation, in hours;
 - viii. results and dates of quarterly cylinder gas audits;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s) (during appropriate quarter(s));



- x. unless previously submitted, results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliance results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous VOC monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous VOC monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in term e)(1)b.xi. and xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

*where no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

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

f) Testing Requirements

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

- a. Emission Limitation:

0.50 lb VOC/1,000 gals of gasoline loaded

Applicable Compliance Method:

Compliance with the lb VOC/1,000 gals gasoline loaded emission limitation shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10(E).

If the permittee seeks to demonstrate compliance with the lb VOC/1,000 gals gasoline loaded emission limitation through the use of a CEMS, compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in term d)(5).

- b. Emission Limitation:

59.75 tons VOC/year from gasoline loading



Applicable Compliance Method:

Compliance with the tons/yr VOC emission limitation shall be demonstrated using the following calculation:

$$\frac{0.50 \text{ lb VOC}}{1,000 \text{ gals gasoline}} * \frac{239,000,000 \text{ gals gasoline}}{\text{yr}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} = 59.75 \frac{\text{tons}}{\text{yr}} \text{ VOC}$$

Where:

$$\frac{0.50 \text{ lb VOC}}{1,000 \text{ gals}} = \text{VOC emission rate, lb VOC/1,000 gals gasoline loaded}$$

$$\frac{239,000,000 \text{ gals gasoline}}{\text{yr}} = \text{annual gasoline throughput, gals/yr}$$

The actual annual emissions shall be calculated by multiplying the VOC emission rate from the most recent emission test (in lbs VOC/1,000 gals gasoline loaded) times the gallons of gasoline loaded per year and dividing by 2,000 lbs/ton.

c. Emission Limitation:

0.019 lb VOC/1,000 gals of distillate loaded

Applicable Compliance Method:

Compliance with the lb VOC/1,000 gals distillate loaded emission limitation shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10(E).

If the permittee seeks to demonstrate compliance with the lb VOC/1,000 gals distillate loaded emission limitation through the use of a CEMS, compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in term d)(5).

d. Emission Limitation:

2.85 tons VOC/yr from distillate loading

Applicable Compliance Method:

Compliance with the tons/yr VOC emission limitation shall be demonstrated using the following calculation:

$$\frac{0.019 \text{ lb VOC}}{1,000 \text{ gals distillate}} * \frac{300,000,000 \text{ gals distillate}}{\text{yr}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} = 2.85 \frac{\text{tons}}{\text{yr}} \text{ VOC}$$



Where:

$$\frac{0.019 \text{ lb VOC}}{1,000 \text{ gals}} = \text{VOC emission rate, lb VOC/1,000 gals distillate loaded}$$

$$\frac{300,000,000 \text{ gals gasoline}}{\text{yr}} = \text{annual distillate throughput, gals/yr}$$

The actual annual emissions shall be calculated by multiplying the VOC emissions rate from the most recent emission test (in lbs VOC/1,000 gals distillate loaded) times the gallons of distillate loaded per year and dividing by 2,000 lbs/ton.

- (2) Within twelve months before permit renewal the permittee shall conduct an emissions test 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.

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 80,000 gallons (302,833 liters) of gasoline are loaded. However, the test should be conducted at the maximum throughput possible.

- (3) If a CEMS is employed, the permittee shall conduct certification tests of the continuous VOC monitoring system no later than 180 days after initial startup pursuant to 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate), ORC section 3704.03(I), and using the VOC detection method that is appropriate for the VOC species present in the emission gases.

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

Ongoing compliance with the VOC emission limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collection as required in the Monitoring and Recordkeeping Section of this permit, and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

- (4) Not later than 30 days prior to a proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe the following in detail:
 - a. the proposed test methods and procedures;
 - b. the emission unit's operating parameters;
 - c. the time(s) and date(s) of the test(s); and
 - d. the person(s) who will be conducting the test(s).



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0115045
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the test(s) and submitted to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s) pursuant to OAC rule 3745-15-04.

- g) Miscellaneous Requirements
 - (1) None.



2. T025, Tank #37

Operations, Property and/or Equipment Description:

630,000 gallon internal floating roof petroleum or ethanol storage tank, Tank #37

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [Facility-wide synthetic restrictions to avoid Title V and MACT applicability]	See Facility-wide Terms and Conditions Section B.
b.	OAC rule 3745-31-05(A)(3) [Best Available Technology (BAT)]	Volatile Organic Compounds (VOC) emissions shall not exceed 1.81 tons per year See b)(2)a.
c.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 19)	General Provisions
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 117b) See b)(2)b.	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-09(L)	The requirements of this rule are less stringent than those specified in 40 CFR Part 60, Subpart Kb

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) for this emissions unit has been determined to be compliance with term b)(2)e. and compliance with the applicable requirements of 40 CFR Part 60, Subpart Kb contained in this permit.
- b. In accordance with 40 CFR 60.110b(a), this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- c. The permittee shall comply with the applicable storage vessel standards required under 40 CFR Part 60, Subpart Kb. Each storage vessel shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - ii. The internal floating roof shall be equipped with a mechanical shoe seal closure device between the wall of the storage vessel and the edge of the internal floating roof. 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 the noncontact internal floating roof, except for automatic bleeder vents (vacuum breakers vents) and the rim space vents, shall provide a projection below the liquid surface.
 - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rims space vents, column wells, ladder wells, sample wells, and stub drains shall 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. Cover 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) The permittee shall employ a submerged fill line during tank loading operations.
- (2) The permittee shall store only ethanol or petroleum liquid with a maximum true vapor pressure less than 76.6 kilopascals (kPa) in this emissions unit.
- (3) The annual throughput of ethanol or petroleum liquid for this storage vessel shall not exceed 54,485,308 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart Kb, including the following sections:
 - a. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with ethanol or petroleum liquid. 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. The permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the ethanol or petroleum liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure

that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Canton City Health Department, Air Pollution Control Division in the inspection report required in term e)(2) (40 CFR 60.115b(a)(3)). Such a request for an extension must document that alternative 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. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with ethanol or petroleum liquid. In no event shall inspections conducted in accordance with the provision occur at intervals greater than 10 years.
- d. The permittee shall keep a record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- e. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the source.
- f. The permittee shall maintain a record of the ethanol or petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that ethanol or petroleum liquid during the respective storage period.
- g. The permittee may use available data on the storage temperature to determine the maximum true vapor pressure as specified below:
 - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - ii. For crude oil or 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 40 CFR 60.17), unless the Canton City Health Department, Air Pollution Control Division 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, or 96, or 97 (incorporated by reference – see 40 CFR 60.17); or
 - (c) Measured by an appropriate method approved by the Canton City Health Department, Air Pollution Control Division; or
 - (d) Calculated by an appropriate method approved by the Canton City Health Department, Air Pollution Control Division.
- h. The permittee shall retain all records for at least 2 years. Records shall be maintained in a manner that they can be readily accessed within 24 hours. Records may be maintained in a hard copy format or in a computer – readable format.
- (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.
- (3) The permittee shall maintain records of the actual annual throughput in gallons per year.
- (4) The permittee shall calculate and maintain records of the annual VOC emissions from this emissions unit. The actual annual throughput recorded for any calendar year shall be the basis for calculating the annual emissions of VOC by using the emissions estimation methodologies provided in the most current version of AP-42, Section 7.1 “Liquid Storage Tanks” or the most recent version of U.S. EPA’s TANKS computer program.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Canton City Health Department, Air Pollution Control Division, by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) If no defects are detected during the annual visual inspection, a “no defects” report shall be submitted to the Canton City Health Department, Air Pollution Control Division. The report shall document that the inspection was conducted in accordance with 40 CFR 60.113b. The report shall be provided within the “Additional Information and Corrections” section of the PER and submitted as part of the PER required by term e)(2).
- (3) The permittee shall submit annual reports to the Canton City Health Department, Air Pollution Control Division that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by the due date identified in the Authorization section of this permit and can be included as part of the annual Fee Emissions Report. Should the annual total VOC emissions exceed 1.81 tons/yr, the permittee shall also submit the actual annual throughput of ethanol or petroleum liquid, and the calculations required by terms d)(3) and (4).
- (4) The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required in terms d)(1)a. and c. (40 CFR 60.113b(a)(1) and (4)) to afford the Canton City Health Department, Air Pollution Control Division the opportunity to have an observer present. If the inspection required in term d)(1)c. (40 CFR 60.113b(a)(4)) 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 Canton City Health Department, Air Pollution Control Division 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 Canton City Health Department, Air Pollution Control Division at least 7 days prior to refilling.
- (5) The permittee shall submit a report to the Canton City Health Department, Air Pollution Control Division that describes the control equipment and certifies that the control equipment meets the specifications in term b)(2)c. (40 CFR 60.112b(a)(1)) and term d)(1)a. (60.113b(a)(1)). This report shall be an attachment to the notification required by 40 CFR 60.7. This record shall be kept for at least 2 years.
- (6) If any of the conditions described in term d)(1)d. (40 CFR 60.113b(a)(2)) are detected during the annual visual inspection required in term d)(1)b. (40 CFR 60.113b(a)(2)), a report shall be furnished to the Canton City Health Department, Air Pollution Control Division 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. This record shall be kept for at least 2 years.



- (7) The permittee shall notify the Canton City Health Department, Air Pollution Control Division 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.
 - (8) The permittee shall submit a notification to the Canton City Health Department, Air Pollution Control Division of the date construction (or reconstruction as defined in 40 CFR 60.15) is commenced postmarked no later than 30 days after such date.
- 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. Control Measure:

The permittee shall utilize an internal floating roof equipped with seals as defined in 40 CFR Part 60.112b(a)(1)(ii) to control the emissions of VOC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section d).
 - b. Emission Limitation:

1.81 tons VOC/year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirement specified in terms d)(3) and (4).

The annual emission limitation was established by setting it equal to the maximum potential to emit (PTE) from this emissions unit as provided in the permit application. The PTE was calculated using U.S. EPA's TANKS program version 4.09 with the input value of the maximum material throughput contained in term c)(3). This PTE takes into account a potential of three roof landings per year and one tank cleaning per year.
- g) Miscellaneous Requirements
- (1) None.



3. Emissions Unit Group -Tanks installed prior to 1973: T001,T002,T003,T009,T015,T030,

EU ID	Operations, Property and/or Equipment Description
T001	896,643 gallon internal floating roof gasoline storage tank, Tank #18
T002	1,013,850 gallon internal floating roof gasoline storage tank, Tank #19
T003	1,031,897 gallon internal floating roof gasoline storage tank, Tank #20
T009	638,400 gallon internal floating roof slop storage tank, Tank #16
T015	70,500 gallon internal floating roof slop storage tank, Tank #4
T030	109,100 gallon internal floating roof gasoline storage tank, Tank #3

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

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

a. None.

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

a. b)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [Facility-wide synthetic restrictions to avoid Title V and MACT applicability]	See Facility-wide Terms and Conditions Section B.
b.	OAC rule 3745-21-09(L)	See c)(1)

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and/or covers as follows:
 - a. the fixed roof storage tank shall be equipped with an internal floating roof.
 - b. the automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. the rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. all openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquid stored in the tank; and
 - b. the maximum true vapor pressure, in pounds per square inch absolute (psia), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 psia.

These records shall be maintained for at least 5 years and shall be made available to the Canton City Health Department, Air Pollution Control Division 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.
 - (3) The permittee shall maintain records of the actual annual throughput in gallons per year.
 - (4) The permittee shall calculate and maintain records of the annual VOC emissions from this emissions unit. The actual annual throughput recorded for any calendar year shall be the basis for calculating the annual emissions of VOC by using the emissions estimation methodologies provided in the most current version of AP-42, Section 7.1 "Liquid Storage Tanks" or the most recent version of U.S. EPA's TANKS computer program.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Canton City Health Department, Air Pollution Control Division, by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Canton City Health Department, Air Pollution Control Division within 30 days of occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all opening other than stub drains were not maintained as required 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. Control Measure:

The permittee shall utilize an internal floating roof equipped with seals to control the emissions of VOC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section d).

g) Miscellaneous Requirements

- (1) None.