



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

2/24/2016

Kevin Cunningham
 Plains Marketing LP - Toronto Terminal
 740306 S. 3510 Rd.
 Cushing, OK 74023

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0641185004
 Permit Number: P0119101
 Permit Type: Initial Installation
 County: Jefferson

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Plains Marketing LP - Toronto Terminal**

Facility ID:	0641185004
Permit Number:	P0119101
Permit Type:	Initial Installation
Issued:	2/24/2016
Effective:	2/24/2016
Expiration:	11/13/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
Plains Marketing LP - Toronto Terminal

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?.....	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
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?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?.....	8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions.....	9
C. Emissions Unit Terms and Conditions	11
1. F001, F001	12
2. P801, Equipment Leaks	17
3. Emissions Unit Group - Stabilizer Heaters: B001, B002	24
4. Emissions Unit Group - Storage Tanks: T009, T010, T011, T012	30
5. Emissions Unit Group - Storage Tanks - API-620 15psi: T013, T014	38



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

Authorization

Facility ID: 0641185004
Application Number(s): A0053205
Permit Number: P0119101
Permit Description: PTIO for: two organic liquid stabilizer trains to separate light-end hydrocarbons from organic liquids (each stabilization train will be capable of processing 20,000 barrels per day and each consists of a 12 MMBtu/hr heater, an API-620 pressurized storage tank and connected to a flare to control vapor releases from the pressurized tanks during VRU downtime); four 42,000-gallon storage tanks; modifications to the following emissions unit previously considered de minimis in accordance with Ohio Administrative Code (OAC) 3745-15-05 will trigger permitting requirements: P801.
Permit Type: Initial Installation
Permit Fee: \$2,400.00
Issue Date: 2/24/2016
Effective Date: 2/24/2016
Expiration Date: 11/13/2019
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Plains Marketing LP - Toronto Terminal
State Rd 7F
Toronto, OH 43964

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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: P0119101

Permit Description: PTIO for: two organic liquid stabilizer trains to separate light-end hydrocarbons from organic liquids (each stabilization train will be capable of processing 20,000 barrels per day and each consists of a 12 MMBtu/hr heater, an API-620 pressurized storage tank and connected to a flare to control vapor releases from the pressurized tanks during VRU downtime); four 42,000-gallon storage tanks; modifications to the following emissions unit previously considered de minimis in accordance with Ohio Administrative Code (OAC) 3745-15-05 will trigger permitting requirements: P801.

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

Emissions Unit ID: F001
 Company Equipment ID: F001
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P801
 Company Equipment ID: P801
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Stabilizer Heaters

Emissions Unit ID:	B001
Company Equipment ID:	B001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	B002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Storage Tanks 1,000 bbls

Emissions Unit ID:	T009
Company Equipment ID:	Tank #9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T010
Company Equipment ID:	Tank #10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T011
Company Equipment ID:	Tank #11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T012
Company Equipment ID:	Tank #12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

Group Name: Storage Tanks- API -620 15psi

Emissions Unit ID:	T013
Company Equipment ID:	Tank #13
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	Tank #14
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

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.

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.

(2) None.



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

C. Emissions Unit Terms and Conditions

1. F001, F001

Operations, Property and/or Equipment Description:

Paved roadways constructed in and around the plant resulting in fugitive particulate emissions from vehicle traffic.

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

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

(a) None.

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

(a) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(ii), as effective 6/30/08	See b)(2)b.
c.	OAC rule 3745-17-07(B)(4)	No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)(5)	No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period
e.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) work practice plan for minimizing or eliminating fugitive dust emissions applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the work practice plan for this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/yr.

- c. For emissions units located in Appendix A areas, the permittee shall employ reasonably available control measures to minimize or eliminate visible PE of fugitive dust by:
 - i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on gravel roads and parking lots.
 - ii. The prompt removal, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.
- b. A determination of the frequency that each roadway, parking area or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway, parking area, or segment inspected;
 - ii. Date inspected;
 - iii. Name of employee responsible for inspection
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee responsible for roadway, parking area, or segment treatment; and
 - viii. Method used to treat the roadway, parking area, or segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Southeast District Office (SEDO) for review and approval. The permittee can begin using the revised Work Practice Plan once SEDO has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to Ohio EPA's Southeast District Office.
- (2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Southeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation:
No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

Applicable Compliance Method:

If required, compliance with the applicable visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

2. P801, Equipment Leaks

Operations, Property and/or Equipment Description:

Equipment Leaks (P801) - Various equipment components, including valves, pumps, flanges, and connectors located throughout the terminal that may result in fugitive emissions due to equipment leaks.

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. b)(1)b. and b)(1)c.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	Volatile Organic Compound (VOC) emissions shall not exceed 0.29 ton per month (TPM) averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(ii), as effective 6/30/08	See b)(2)b.
c.	OAC rule 3745-31-05(E), as effective June 30, 2008.	VOC emissions shall not exceed 0.29 ton per month (TPM) averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) VOC emissions limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, vent, cover, any bypass in the closed vent system, and each storage vessel. This program shall meet the following requirements:

- a. Leaks shall be detected by the use of either a “Forward Looking Infra-Red” (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A.
- b. An initial monitoring shall be completed within 30 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year).
- c. If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semi-annual.
- d. If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual.
- e. If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.
- f. The program shall require the first attempt at repair within five (5) calendar days of determining a leak.
- g. The program shall require that the leaking component is repaired within 30 calendar days after the leak is detected.
- h. The program shall allow for the delayed repair of a leaking component following the language found in 40 CFR 60.5416(c)(5).

- i. The program shall following the Monitoring and Record Keeping requirements described in paragraph 5.d) of this permit.
- (2) In the event that a leak or defect is detected in the cover, closed vent system, process equipment, or control device, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected as allowed in 40 CFR 60.5416(c)(4). Any delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) **Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Cameras**
 - a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.
 - b. The following information shall be recorded during each leak inspection:
 - i. the date the inspection was conducted;
 - ii. the name of the employee conducting the leak check;
 - iii. the identification of any component that was determined to be leaking;
 - iv. the date the first attempt to repair the component was made;
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
 - vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
 - c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
 - d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(2) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing a Method 21 Analyzer

a. Leaks shall be measured by utilizing U.S. EPA Method 21 (40 CFR Part 60, Appendix A). All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm or 10,000 ppm (as applicable) for determining compliance.

b. A component is considered to be leaking if the instrument reading is equal to or greater than:

pressure relief device in gas/vapor service	10,000 ppm
pressure relief device in light liquid service	10,000 ppm
pumps in light liquid service	10,000 ppm
compressor	500 ppm
sampling connection system*	*
open ended valves or lines**	**
valves in gas/vapor and light liquid service	10,000 ppm
closed vent system	500 ppm
connectors	10,000 ppm
all other ancillary and associated equipment in VOC service	10,000 ppm

* must be equipped with a closed-purge, closed-loop, or closed-vent system

** must be equipped with a cap, blind flange, plug, or a second valve

c. The following information shall be recorded during each leak inspection:

- i. the date the inspection was conducted;
- ii. the name of the employee conducting the leak check;
- iii. the identification of any component that was determined to be leaking (company ID and component type (flange, pump, etc.);
- iv. the date the first attempt to repair the component was made;
- v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);

- vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
- d. The permittee shall maintain records that demonstrate the Method 21 analyzer is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
 - e. In order to calibrate the analyzer, the following calibration gases shall be used:
 - i. zero air, which consists of less than 10 ppm of hydrocarbon in air; and
 - ii. a mixture of air and methane or n-hexane at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.
 - f. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (3) The permittee shall perform daily inspections, each day that an operator is at the facility and when the facility is in operation, for indications of releases from the pressure relief valves, and any olfactory, visual, or auditory indications of equipment leaks. The positive indication of a release or a leak shall be noted in an operations log, along with the following information:
- a. the name of the inspector;
 - b. the date and time inspected;
 - c. the identification of the pressure relief valve that released and/or piece of equipment that leaked;
 - d. the estimated or calculated duration of the pressure relief valve release and/or equipment leak and the estimated emission totals; and
 - e. any corrective actions taken to minimize or eliminate the release or leak.
- e) Reporting Requirements
- (1) 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.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (3) Supplement to the PER for the Ancillary Equipment Leak Detection and Repair Program

For each inspection that occurred during the year, the permittee shall submit the following information with the annual PER from data collected by the ancillary equipment leak detection and repair program:

- a. the date of the inspection;
- b. the number of components determined to be leaking;
- c. the company ID and component type (flange, pump, etc.) of each leaking component;
- d. the total number of components at the site;
- e. the percent of components determined to be leaking;
- f. a list of all components that have not been repaired due to a delay of repair and the reason for the delay; and
- g. a notification indicating if the permittee has changed future inspection frequencies based on the percent of components leaking.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:
VOC emissions shall not exceed 0.29 ton per month averaged over a 12-month rolling period.



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

Applicable Compliance Method:

The monthly emission limitation for this emission unit is based on the restricted throughput limitation. The permittee shall demonstrate compliance with the monthly VOC limitations in accordance with the equations and procedures obtained from USEPA Protocol for Equipment Leak Emission Estimates, dated November 1995 and data from the permit application.

$$\text{Monthly emissions (TPM)} = \sum [(\text{component count} * \text{component factor} (\text{lb/hr/component}) * 8,760 (\text{hrs/yr})) / 2,000 (\text{lbs/ton})] / 12 (\text{months/yr})$$

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group - Stabilizer Heaters: B001, B002

EU ID	Operations, Property and/or Equipment Description
B001	Stabilizer Heater #1 - Natural gas-fired heater with a heat input capacity of 12 MMBtu/hr
B002	Stabilizer Heater #2 - Natural gas-fired heater with a heat input capacity of 12 MMBtu/hr

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Nitrogen Oxide (NOx) emissions shall not exceed 0.62 ton per month averaged over a rolling, 12-month period for each emissions unit.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.36 ton per month averaged over a rolling, 12-month period for each emissions unit.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.048 ton per month averaged over a rolling, 12-month period for each emissions unit.</p> <p>See b)(2)a. below.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, and VOC emissions from this air contaminant source since the PTE for each emissions unit is less than 10 TPY. See b)(2)b. below.
c.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c-48c) [In accordance with 40 CFR Part 60.40c(a), this emissions unit is a steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal 10 MMBtu/hr.]	See d)(2) and e)(3) below.
d.	40 CFR Part 60, Subpart A (60.1-60.19)	General provisions may apply.
e.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
f.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) NOx, CO, and VOC emissions limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, and VOC emissions from this air contaminant source since the potential to emit is less than 10 TPY.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart Dc including the following sections:

60.48c(g)(1)	Amount of each fuel combusted during each operating day.
60.48c(g)(2)	Elect to record and maintain records of the amount of each fuel combusted during each calendar month.
60.48c(g)(3)	Elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
60.48c(i)	Records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the Southeast District Office (SEDO), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Southeast District Office (SEDO).
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Southeast District Office (SEDO) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - a. The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(1) above:
 - i. each day when a fuel other than natural gas was burned in this emissions unit.
 - b. The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(3) above:
 - i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - ii. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart Dc including the following sections:

60.48c(a)	Notification of the date of construction or reconstruction and actual startup.
-----------	--

f) Testing Requirements

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

a. Emission Limitation:

NOx: 0.62 ton per month averaged over a rolling, 12-month period
 CO: 0.36 ton per month averaged over a rolling, 12-month period
 VOC: 0.048 ton per month averaged over a rolling, 12-month period

Applicable Compliance Method:

The monthly average emission limitations were established by multiplying [the maximum annual heat input capacity for each heater (105,120 MMBtu/year)] by [the appropriate AP-42 emission factor located in Table 1.5-1: NOx=13.0; CO=7.5; and, VOC=1.0 (lb/1,000 gal), normalized by dividing by 91.5 MMBtu/1,000 gal] and [dividing by 2,000 lbs/ton], then [dividing by 12 months].

Example:

NOx: $[[105,120 \text{ MMBtu/yr} * (13.0 \text{ lb/1,000 gal} / 91.5 \text{ MMBtu/1,000 gal})] / 2,000 \text{ lb/ton}] / 12 \text{ mo./yr} = 0.62 \text{ TPM}$

b. Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by OAC rule for each stack serving these emissions units.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with US EPA Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. Emissions Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be determined using the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.5 Table 1.5-1 (7/08) emission factor for particulates (0.2 lbs PM/1,000 gal) and dividing by 91.5 mmBtu/1,000 gal.

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5.



Final Permit-to-Install and Operate
Plains Marketing LP - Toronto Terminal
Permit Number: P0119101
Facility ID: 0641185004
Effective Date: 2/24/2016

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group - Storage Tanks: T009, T010, T011, T012

EU ID	Operations, Property and/or Equipment Description
T009	Petroleum liquids storage tank sized to a capacity of 42,000 gallons (1,000 bbls) and equipped with an internal floating roof
T010	Petroleum liquids storage tank sized to a capacity of 42,000 gallons (1,000 bbls) and equipped with an internal floating roof
T011	Petroleum liquids storage tank sized to a capacity of 42,000 gallons (1,000 bbls) and equipped with an internal floating roof
T012	Petroleum liquids storage tank sized to a capacity of 42,000 gallons (1,000 bbls) and equipped with an internal floating roof

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. g)(1).

(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. d)(2) through (3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Volatile organic compound (VOC) emissions shall not exceed 0.23 ton per month, averaged over a rolling, 12-month period for each emissions unit.</p> <p>The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the PTE for each emissions unit is less than 10 TPY.</p> <p>See b)(2)b. below.</p>
c.	<p>40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b)</p> <p>[In accordance with 40 CFR 60.110b, this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters (m³) (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.]</p>	<p>The permittee shall equip each storage vessel with a fixed roof in combination with an internal floating roof that meets the specifications of 40 CFR 60.112b(a)(1).</p>
d.	<p>40 CFR, Part 60, Subpart A [40 CFR 60.1 through 60.9]</p>	General Provisions
e.	OAC rule 3745-21-09(L)	The requirements of this rule are equivalent to the requirements of 40 CFR, 60, Subpart Kb.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) VOC emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the

less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since their potentials to emit are less than 10 TPY.

c) Operational Restrictions

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

60.112b(a)(1)(i)	Internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) at all times, except during initial fill, when empty or when emptied and refilled; when internal roof is resting on leg supports, filling, emptying and refilling shall be continuous and rapid.
60.112b(a)(1)(ii)	Each internal roof shall be equipped with one of the following: (A) liquid-mounted seal made up of a foam- or liquid-filled seal mounted in contact with the liquid; (B) two seals mounted one above the other so that each forms a continuous closure that completely cover the space between the wall of the storage vessel and the edge of the internal floating roof (lower seal may be vapor-mounted); or (C) mechanical shoe seal .
60.112b(a)(1)(iii)	Each opening in a noncontact internal floating roof (except for automatic bleeder vents, vacuum breaker vents, and the rim space vents) is to provide projection below the liquid surface.

60.112b(a)(1)(iv)	Each opening in the internal floating roof (except for leg sleeves, automatic bleeder and rim space vents, column, ladder and sample wells, and stub drains) is to be equipped with a cover or lid, equipped with a gasket, to be maintained closed at all times except when device is in use; covers on each access hatch and automatic gauge float well shall be bolted except when in use.
60.112b(a)(1)(v)	Automatic bleeder vents shall be equipped with a gasket and open only when the roof is being floated off or is being landed on the roof leg supports.
60.112b(a)(1)(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.
60.112b(a)(1)(vii)	All sampling shall be done through the sampling well, equipped with a slit fabric cover that covers at least 90% of the opening.
60.112b(a)(1)(viii)	Each opening in the internal floating roof allowing for passage of a fixed-roof support column shall have a flexible fabric sleeve seal or a gasketed sliding cover.
60.112b(a)(1)(ix)	Each opening in the internal floating roof allowing for passage of a ladder shall have a gasketed sliding cover.

d) Monitoring and/or Recordkeeping Requirements

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

60.113b(a)(1)	Visual inspections and repair of holes, tears or other openings or defects in the internal floating roof, primary seal or seal fabric prior to filling storage vessel.
---------------	--

60.113b(a)(2)	Visual inspections of the internal floating roof and primary seal or secondary seal through manholes and roof hatches on the fixed-roof at least once every 12 months after initial fill; if the internal floating roof is not resting on the surface of the VOL, or there is liquid accumulated on the roof, or the seal is detached or there are holes or tears in the seal fabric, storage vessel must be repaired or emptied and removed from service within 45 days; 30-day extension may be requested in the inspection report required by 60.115b(a)(3).
60.113b(a)(4)	Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years.
60.115b(a)(2)	Record of each inspection required pursuant to 60.113b(a)(1)-(4), including storage vessel identification, date inspection performed and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

60.116b	(A) 2 year records retention; (B) records of each storage vessel dimension and capacity readily accessible; and, (C) records of the VOL stored in each vessel, the period of storage and the maximum true vapor pressure (TVP) of that VOL during storage period.
---------	---

- (2) The permittee shall maintain records of the following information for each fixed roof tank equipped with an internal floating roof.
- a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request. 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 monthly records of the following information:
- a. the total quantity of light crude oil throughput, in gallons;
 - b. the rolling, 12-month summation of light crude oil throughput, and for the first 12 calendar months of operation the cumulative total, in gallons;
 - c. the total quantity of VOC emissions; and
 - d. the rolling, 12-month summation of VOC emissions.

e) Reporting Requirements

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

60.7(a)(3) and 60.115b(a)(1)	Notification of initial startup date and certification that control equipment meets specifications in 60.112b(a) and 60.113b(a) postmarked within 15 days.
------------------------------	--

60.113b(a)(5)	30-day written notification prior to filling or refilling a storage vessel requiring a visual inspection per 60.113b(a)(1) and (4); telephone and written notification 7 days prior to unplanned inspections or refilling.
60.115b(a)(3)	Report identifying any annual inspection that detects conditions described in 60.113b(a)(2), including storage vessel identification, nature of defects and date/nature of repair or date the storage vessel was emptied, within 30 days of inspection.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Southeast District Office (SEDO) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

f) **Testing Requirements**

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

a. Emissions Limitation:

Total VOC emissions shall not exceed 0.23 TPM, averaged over a rolling, 12-month period for each emissions unit.

Applicable Compliance Method:

Compliance with the TPM emissions limitations shall be determined using records required by d)(2) and d)(3) and in accordance with the TANKS 4.0.9d program for uncontrolled losses from normal tank operations (maximum potential per the permittee's application), physical characteristics of the tank, crude oil properties and site-specific weather condition information provided in the permittee's application and the emissions estimation equations in AP-42 Section 7.1.3.2 (11/06). Compliance with the TPM emissions limitation shall be demonstrated by dividing the results of the following equations by 12 months per year:

Normal tank operations:

X = annual VOC emissions per emissions unit for normal operations as calculated using the TANKS 4.0.9d program.

Roof landing episodes:

Y = annual VOC emissions per emissions unit from roof landings as calculated using the following equation:

$$\sum_{i=1}^N L_{TL}$$

where:

N = number of roof landing episodes during the year; and

L_{TL} = total losses during roof landing, lb per landing episode as provided in the permittee's application;

Total VOC emissions:

VOC (tons per month) = (X + Y) / 12 months per year

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.

5. Emissions Unit Group - Storage Tanks - API-620 15psi: T013, T014

EU ID	Operations, Property and/or Equipment Description
T013	Storage Tank #13 (T013) - One 40,000 barrel API-620 storage tank which will operate under pressure at approximately 15 psig; emissions will be routed to a VRU or to the Stabilizer Flare (183.6 MMBtu/hr) during VRU downtime.
T014	Storage Tank #14 (T014) - One 40,000 barrel API-620 storage tank which will operate under pressure at approximately 15 psig; emissions will be routed to a VRU or to the Stabilizer Flare (183.6 MMBtu/hr) during VRU downtime.

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. g)(1)

(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. c)(2)-(5), and d)(2)-(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Volatile organic compound (VOC) emissions shall not exceed 0.41 ton per month, averaged over a rolling, 12-month period for both emissions units combined.</p> <p>Nitrogen Oxide (NOx) emissions shall not exceed 0.13 ton per month averaged over a rolling, 12-month period for both emissions units combined.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.13 ton per month averaged</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>over a rolling, 12-month period for both emissions units combined.</p> <p>See b)(2)a. below.</p>
b.	<p>OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08</p>	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, NOx, and CO emissions from the air contaminant sources since the calculated annual emission rate for both emissions units combined is less than 10 TPY taking into account the voluntary restriction from AOC rule 3745-31-05(E).</p> <p>See b)(2)b. below.</p>
c.	<p>OAC rule 3745-31-05(E), as effective 6/30/2008</p>	<p>Volatile organic compound (VOC) emissions shall not exceed 0.41 ton per month, averaged over a rolling, 12-month period for both emissions units combined.</p> <p>Nitrogen Oxide (NOx) emissions shall not exceed 0.13 ton per month averaged over a rolling, 12-month period for both emissions units combined.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.13 ton per month averaged over a rolling, 12-month period for both emissions units combined.</p>
d.	<p>40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b)</p> <p>[In accordance with 40 CFR 60.110b, this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters (m³) (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.]</p>	<p>The permittee shall equip each storage vessel with a closed vent system and control device that meets the specifications of 40 CFR 60.112b(a)(3).</p>
e.	<p>OAC rule 3745-21-09(L)</p>	<p>The requirements of this rule are equivalent to the requirements of 40 CFR, 60, Subpart Kb.</p>

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) VOC, NOx, and CO emissions limit apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

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

60.112b(a)(3)(i)	The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, §60.485(b).
60.112b(a)(3)(ii)	The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (§60.18) of the General Provisions.

- (2) This emissions unit shall not be operated without the associated vapor recovery unit (VRU) or stabilizer flare. The VRU and stabilizer flare shall be designed and operated as required in accordance with the manufacture’s recommendations.
- (3) The stabilizer flare shall be operated with a flame present at all times when gases are vented to it.
- (4) An automatic flame ignition system shall be installed to meet one of the following requirements:
 - a. If using a pilot flame ignition system, the presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. A pilot flame shall be maintained at all times in the flare’s pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound; or

- b. If using an electric arc ignition system, the arcing of the electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor the electric arc ignition system.
- (5) The stabilizer flare, its auto ignition system, and its recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall comply with the applicable restrictions under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(d)	The owner or operator of each source that is equipped with a closed vent system and a flare to meet the requirements in §60.112b (a)(3) or (b)(2) shall meet the requirements as specified in the general control device requirements, §60.18 (e) and (f).
------------	--

- (2) The permittee shall maintain records of the following information for each fixed roof tank equipped with an internal floating roof.
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request. 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 monthly records of the following information:
 - a. the total quantity of light crude oil throughput, in gallons;
 - b. the rolling, 12-month summation of light crude oil throughput, and for the first 12 calendar months of operation the cumulative total, in gallons;
 - c. the total quantity of VOC emissions; and,
 - d. the rolling, 12-month summation of VOC emissions.
- (4) The permittee shall:
 - a. continuously monitor the presence of the flame;

- b. record all periods during which the automatic flare ignition system (pilot flame or electronic arc ignition system) or thermocouple was not working and gas was being vented to the flare/combustion device; and,
- c. record all periods of time during which gas was being vented to the flare/combustion device and there was no flame.

e) Reporting Requirements

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

60.8 and 60.115b(d)	Reporting requirements for flares.
60.115b(d)(1)	A report containing the measurements required by §60.18(f) (1), (2), (3), (4), (5), and (6) shall be furnished to the Administrator as required by §60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
60.115b(d)(2)	Records shall be kept of all periods of operation during which the flare pilot flame is absent.
60.115b(d)(3)	Semiannual reports of all periods recorded under §60.115b(d)(2) in which the pilot flame was absent shall be furnished to the Administrator.

The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - a. The permittee shall identify the following additional information in the annual permit evaluation report:
 - i. all periods of time when the pilot flame or electronic arc ignition system is not working, including the date, time, and duration of each such period.

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

f) Testing Requirements

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

a. Emissions Limitation:

Total VOC emissions shall not exceed 0.41 TPM, averaged over a rolling, 12-month period for both emissions units combined.

Applicable Compliance Method:

Compliance with the TPM emissions limitation shall be demonstrated by the following calculations using the AP-42 Table 1.5-1 emission factor (1.0 lb/1,000 gal) for pilot and enrichment gas emissions; and the vapor inlet loading (4,098,646 scf/yr), vapor specific volume (8.606 scf/lb), and flare destruction efficiency (98%) from combustion of controlled vapors:

Pilot/Enrichment Gas Combustion Emissions:

$1.0 \text{ lb}/1,000 \text{ gal} / 91.5 \text{ MMBtu}/1,000 \text{ gal} = 0.0109 \text{ lb/MMBtu}$

$20,244.36 \text{ MMBtu/yr (as submitted in application)} * 0.0109 \text{ lb/MMBtu} / 2,000 \text{ lb/ton} = 0.11 \text{ TPY}$

Controlled Vapors:

$[(4,098,646 \text{ scf/yr} / 8.606 \text{ scf/lb}) * (1-0.98)] / 2,000 \text{ lb/ton} = 4.76 \text{ TPY}$

Total for Both Tanks Combined:

$0.11 \text{ TPY} + 4.76 \text{ TPY} = 4.87 \text{ TPY}$

$(4.87 \text{ TPY}) / (12 \text{ mo./yr}) = 0.41 \text{ TPM}$

If required, volatile organic compound emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitations:

NOx emissions shall not exceed 0.13 TPM, averaged over a rolling, 12-month period for both emissions units combined.

Applicable Compliance Method:

Compliance with the TPM emissions limitation shall be demonstrated by the following calculations using the AP-42 Table 1.5-1 emission factor (13.0 lb/1,000 gal) for pilot and enrichment gas emissions; and a 0.068 lb NOx/MMBtu



emissions factor from AP-42 Section 13.5 for emissions from combustion of controlled vapors:

Pilot/Enrichment Gas Combustion Emissions:

$$13.0 \text{ lb}/1,000 \text{ gal} / 91.5 \text{ MMBtu}/1,000 \text{ gal} = 0.142 \text{ lb}/\text{MMBtu}$$

$$20,244.36 \text{ MMBtu}/\text{yr} \text{ (as submitted in application)} * 0.142 \text{ lb}/\text{MMBtu} / 2,000 \text{ lb}/\text{ton} = 1.44 \text{ TPY}$$

Controlled Vapors:

$$5,016.74 \text{ MMBtu}/\text{yr} \text{ (as submitted in application)} * 0.068 \text{ lb}/\text{MMBtu} / 2,000 \text{ lb}/\text{ton} = 0.17 \text{ TPY}$$

Total for Both Tanks Combined:

$$1.44 \text{ TPY} + 0.17 \text{ TPY} = 1.61 \text{ TPY}$$

$$(1.61 \text{ TPY}) / (12 \text{ mo.}/\text{yr}) = 0.13 \text{ TPM}$$

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

CO emissions shall not exceed 0.13 TPM, averaged over a rolling, 12-month period for both emissions units combined.

Applicable Compliance Method:

Compliance with the TPM emissions limitation shall be demonstrated by the following calculations using the AP-42 Table 1.5-1 emission factor (7.5 lb/1,000 gal) for pilot and enrichment gas emissions and a 0.31 lb CO/MMBtu emissions factor from AP-42 Section 13.5 for emissions from combustion of controlled vapors:

Pilot/Enrichment Gas Combustion Emissions:

$$7.5 \text{ lb}/1,000 \text{ gal} / 91.5 \text{ MMBtu}/1,000 \text{ gal} = 0.0820 \text{ lb}/\text{MMBtu}$$

$$20,244.36 \text{ MMBtu}/\text{yr} \text{ (as submitted in application)} * 0.082 \text{ lb}/\text{MMBtu} / 2,000 \text{ lb}/\text{ton} = 0.83 \text{ TPY}$$

Controlled Vapors:

$$5,016.74 \text{ MMBtu}/\text{yr} \text{ (as submitted in application)} * 0.31 \text{ lb}/\text{MMBtu} / 2,000 \text{ lb}/\text{ton} = 0.78 \text{ TPY}$$

Total for Both Tanks Combined:

$$0.83 \text{ TPY} + 0.78 \text{ TPY} = 1.61 \text{ TPY}$$

$$(1.61 \text{ TPY}) / (12 \text{ mo.}/\text{yr}) = 0.13 \text{ TPM}$$



If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.