



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

4/22/2016

Certified Mail

Nathan Wheldon, PE
 Hopedale Fractionation Facility
 1515 Arapahoe Street
 Suite 1600 - Tower 1
 Denver, CO 80202-2137

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0634005042
 Permit Number: P0118867
 Permit Type: Administrative Modification
 County: Harrison

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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, Harrison News Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street, Suite 700
 P.O. Box 1049
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
 2195 Front Street
 Logan, OH 43138

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 in writing 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 Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

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

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Hopedale Fractionation Fractionation Facility is requesting an administrative modification of three of their emissions units, J001 (railcar loading operation), B001, and B002, (natural gas boilers to heat oil) to update their emission allowables based upon actual liquid sampling data information for J001, and to use AP-42 emission factors versus actual manufacturer's emission factors.

3. Facility Emissions and Attainment Status:

This is a current Title V facility and is not a NSR facility.

4. Source Emissions:

The three emissions units' emissions are very small compared to the facility emissions that are triggering the facility to be subject to Title V.

5. Conclusion:

6. Please provide additional notes or comments as necessary:

Recommended that this permitting action be issued draft in order to secure facility comments.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	2.64
VOC	17.32
NOx	16.7
CO	28.1
SO2	0.24

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 Administrative Modification

Hopedale Fractionation Facility

West of Hwy 151, North of Giacobbi Rd., Green Twp., OH 43986

ID#:P0118867

Date of Action: 4/22/2016

Permit Desc: Administrative modification of J001 (railcar loading operation) and B001 and B002 (natural gas-fired boilers to heat oil) to update their emission rates based upon actual liquid sampling data information for J001, and to use AP-42 emission factors versus actual manufacturer's emission factors..

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: Jessica Kuenzli, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Hopedale Fractionation Facility**

Facility ID:	0634005042
Permit Number:	P0118867
Permit Type:	Administrative Modification
Issued:	4/22/2016
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Hopedale Fractionation Facility

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Draft Permit-to-Install
Hopedale Fractionation Facility
Permit Number: P0118867
Facility ID: 0634005042

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0634005042
Facility Description: 60,000 bpd (2.52 MMgpd) Fractionation Facility
Application Number(s): A0053221
Permit Number: P0118867
Permit Description: Administrative modification of J001 (railcar loading operation) and B001 and B002 (natural gas-fired boilers to heat oil) to update their emission rates based upon actual liquid sampling data information for J001, and to use AP-42 emission factors versus actual manufacturer's emission factors.
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/22/2016
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Hopedale Fractionation Facility
West of Hwy 151, North of Giacobbi Rd
Green Twp., OH 43986

of a Permit-to-Install 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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118867

Permit Description: Administrative modification of J001 (railcar loading operation) and B001 and B002 (natural gas-fired boilers to heat oil) to update their emission rates based upon actual liquid sampling data information for J001, and to use AP-42 emission factors versus actual manufacturer's emission factors.

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

Emissions Unit ID:	J002
Company Equipment ID:	J002
Superseded Permit Number:	P0116897
General Permit Category and Type:	Not Applicable

Group Name: 79.55 MMBTU/HR NG heaters

Emissions Unit ID:	B001
Company Equipment ID:	B001
Superseded Permit Number:	P0114073
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	B002
Superseded Permit Number:	P0114073
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Hopedale Fractionation Facility
Permit Number: P0118867
Facility ID: 0634005042
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Draft Permit-to-Install
Hopedale Fractionation Facility
Permit Number: P0118867
Facility ID: 0634005042
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) B.2.

2. Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), for this project was not necessary because the emissions units not exempted from modeling per OEPA Engineering Guides #69 and #70, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified 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 ton per year may require the permittee to apply for and obtain a new PTIO.

3. Risk Management Plans:

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.



Draft Permit-to-Install
Hopedale Fractionation Facility
Permit Number: P0118867
Facility ID: 0634005042
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C. Emissions Unit Terms and Conditions

1. J002

Operations, Property and/or Equipment Description:

Railcar loading rack w/ VRU

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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) and ORC 3704.03(T)	Emissions from this emissions unit shall not exceed the following: 1.28 tons of VOC per month average over a 12 month period. See b)(2)a. through b)(2)f. below.

(2) Additional Terms and Conditions

- a. For any transfer of natural gas liquids from a pressurized storage tank to a railcar, the displaced vapors shall be collected by a vapor recovery system. The vapor recovery system shall be equipped with a vapor tight vapor line from the pressurized storage tanks to the rail vessels and a means to ensure that the vapor line is connected before natural gas liquids are transferred. The vapor recovery system shall be designed and operated to route at least 98.7 percent of displaced vapors from the loading process back to the pressurized storage tanks.
- b. All natural gas liquids loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.
- c. All leaks in liquid lines and vapor lines shall be repaired within fifteen days after identification.
- d. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
- e. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

- f. The permittee shall not permit natural gas liquids to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- c) **Operational Restrictions**
 - (1) The vapor recovery system shall be kept in good working order and shall be used at all times during the loading of natural gas liquids into railcars.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain a log of the downtime for the vapor recovery system when this emissions unit is in operation.
 - (2) While natural gas liquids are being loaded, the permittee shall monitor the vapor recovery system for leaks. If vapor leaks are detected, the permittee shall maintain a record of the following information:
 - a. the date the leak was detected;
 - b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;
 - c. the leak detection method;
 - d. the corrective action(s) taken to repair each leak and the date of final repair;
 - e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and
 - f. the inspector's name and signature.
- e) **Reporting Requirements**
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each day that natural gas liquid is transferred via the loading rack and the vapor recovery system was not in operation;
 - b. each day when a leak is detected in the vapor recovery system or natural gas liquid transfer hoses other than from disconnection; and
 - c. any leaks in vapor or liquid lines that are not repaired within 15 days after identification (in accordance with d)(2)).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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. Emissions Limitation:

VOC emissions shall not exceed 1.28 tons per month average over a 12 month period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above is demonstrated by the following calculation based on the emissions factors and throughputs in the permittee's application:

$$[(\text{Maximum Yearly Natural Gasoline Railcar Loading (Mgal/yr)} \times \text{Loading Losses EF LL2 (lb/Mgal)} \times [1 - \text{Loading Collection Efficiency (\%)}]) + [\text{Yearly Gasoline Railcar Loading (railcars/yr)} \times \text{Gasoline Railcar Hose Disconnect EF (lb/railcar)} + \text{Yearly Pressurized Railcar Loading (railcars/yr)} \times \text{Pressurized Railcar Hose Disconnect EF (lb/railcar)}] / 2,000 \text{ (lb/ton)} = \text{VOC emissions tons/yr}$$

$$(\text{VOC Emissions tons/yr}) / (12 \text{ months/year}) = \text{VOC emissions per rolling 12-month period}$$

Where:

- LL2 = 5.01 lb/Mgal
- Loading Collection Efficiency 98.7 %
- Yearly Natural Gasoline Railcar Loading = 400,000 Mgal/yr
- Natural Gasoline Railcars Loaded = 17,520*
- Gasoline Railcar Hose Disconnect EF = 0.083 lb/railcar
- Yearly Pressurized Railcar Loading = 53,333 railcars/yr
- Pressurized Railcar Hose Disconnect EF = 0.057 lb/railcar

* Worst case: 6 railcars x (8760/3 hours) = 17,520 railcars/yr

Therefore:

$$[(400,000 \text{ Mgal/yr} \times 5.01 \text{ lb/Mgal}) \times (1 - 0.987) + (17,520 \text{ railcars/yr} \times 0.083 \text{ lb/railcar}) + (53,333 \text{ railcars/yr} \times 0.057 \text{ lb/railcar})] / 2,000 \text{ lb/ton} = 15.30 \text{ tons/yr VOC emissions}$$

$$(15.30 \text{ tons/yr}) / (12 \text{ months/yr}) = 1.28 \text{ tons of VOC per month average over a 12 month period}$$



Draft Permit-to-Install
Hopedale Fractionation Facility
Permit Number: P0118867
Facility ID: 0634005042

Effective Date: To be entered upon final issuance

If required, the permittee shall perform test(s) to determine the reduction efficiency of a vapor control system. These tests may include methods described in 40 CFR (Code of Federal Regulations) 63.11120 or an alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group - 79.55 MMBTU/HR NG heaters: B001, B002

EU ID	Operations, Property and/or Equipment Description
B001	79.55 MMBtu/hr NG Hot Oil Process Heater #1
B002	79.55 MMBtu/hr NG Hot Oil Process Heater #2

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) 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.	ORC 3704.03(T)	Emissions from this emissions unit shall not exceed the following: 1.39 tons of NOx per month average over a 12 month period; and 2.34 tons of CO per month average over a 12 month period.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Emissions from this emissions unit shall not exceed the following: 0.22 ton of PE per month average over a 12 month period; 0.16 ton of VOC per month average over a 12 month period; and 0.02 ton of SO2 per month average over a 12 month period.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) do not apply to the PE, VOC, and SO2 emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b., below



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/million BTU.
f.	OAC rule 3745-18-06(A)	See b)(2)e., below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) 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 rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. There is no sulfur dioxide emission limitation established by OAC Chapter 3745-18-06 for this emissions unit because the emissions unit employs only natural gas.

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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



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:

NOx shall not exceed 1.39 tons per month average over a 12 month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 Table 1.4-1 (7/98) lb/MMBtu emission factor of 50 lb/MMscf (low NOx burner).

If required, NOx shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

NOx (pounds/hour) = [NOx emission factor (50 lb/MMscf) X (the maximum heat input rating of the combustion unit (79.55 MMBTU/hr))]/(1050 btu/scf) = 3.8 pounds of NOx per hour

NOx (tons/year) = [3.8 pounds per hour x 8760 hours] / 2000 = 16.64 tons of NOx per year

NOx (tons/month) = 16.64 tons per year / 12 month period = 1.39 tons of NOx per month average over a 12 month period*

* Note the allowable is based on maximum potential.

b. Emission Limitation:

CO shall not exceed 2.34 tons per month average over a 12 month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 Table 1.4-1 (7/98) lb/MMBtu emission factor of 84 lb/MMscf (low NOx burner).

If required, CO emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

CO (pounds/hour) = [CO emission factor (84 lb/MMscf) X (the maximum heat input rating of the combustion unit (79.55 MMBTU/hr))] / (1050 btu/scf) = 6.4 pounds of CO per hour

CO (tons/year) = [6.4 pounds per hour x 8760 hours] / 2000 = 28.03 tons of CO per year

CO (tons/month) = 16.64 tons per year / 12 month period = 2.34 tons of CO per month average over a 12 month period*

* Note the allowable is based on maximum potential.

c. Emission Limitations:

PE shall not exceed 0.22 ton of PE per month average over a 12 month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 Table 1.4-2 (7/98) lb/MMBtu emission factor of 7.6 lb/MMscf.

If required, PE shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

PE (pounds/hour) = [PE emission factor (7.6 lb/MMscf) X (the maximum heat input rating of the combustion unit (79.55 MMBTU/hr))]/(1050 btu/scf) = 0.58 pounds of PE per hour

PE (tons/year) = [0.58 pounds per hour x 8760 hours] / 2000 = 2.6 tons of PE per year

PE (tons/month) = 2.6 tons per year/12 month period = 0.22 ton of PE per month average over a 12 month period*

* Note the allowable is based on maximum potential.



d. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

VOC emissions shall not exceed 0.16 ton of VOC per month average over a 12 month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 Table 1.4-2 (7/98) lb/MMBtu emission factor of 5.5 lb/MMscf.

If required, VOC emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 18, 25, or 25A 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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

VOC (pounds/hour) = [VOC emission factor (5.5 lb/MMscf) X (the maximum heat input rating of the combustion unit (79.55 MMBTU/hr))]/(1050 btu/scf) = 0.42 pound of VOC per hour

VOC (tons/year) = [0.42 pound per hour x 8760 hours] / 2000 = 1.9 tons of VOC per year

VOC (tons/month) = 1.9 tons per year / 12 month period = 0.16 ton of VOC per month average over a 12 month period*

* Note the allowable is based on maximum potential.

f. Emission Limitation:

SO₂ emissions shall not exceed 0.02 ton of SO₂ per month average over a 12 month period.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 Table 1.4-2 (7/98) lb/MMBtu emission factor of 0.6 lb/MMscf.

If required, SO₂ emissions shall be determined according to test Methods 1 - 4, and 6 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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

SO₂ (pounds/hour) = [SO₂ emission factor (0.6 lb/MMscf) X (the maximum heat input rating of the combustion unit (79.55 MMBTU/hr)]/(1050 btu/scf) = 0.05 pound of SO₂ per hour

SO₂ (tons/year) = [0.05 pound per hour x 8760 hours] / 2000 = 0.22 ton of SO₂ per year

SO₂ (tons/month) = 1.9 tons per year / 12 month period = 0.02 ton of SO₂ per month average over a 12 month period*

* Note the allowable is based on maximum potential.

g) Miscellaneous Requirements

- (1) None.