Ohio Environmental Protection Agency

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

5/5/2016

Certified Mail

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

David Mick
Guttman Realty Company dba Bulk Terminal Storage
1521 S. CHILLICOTHE RD.
AURORA, OH 44202

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1667020021
Permit Number: P0119922
Permit Type: Renewal
County: Portage

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Courier. 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
PO Box 1049
Columbus, Ohio 43216-1049

and

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

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

Permit Strategy Write-Up

1. Check all that apply:

   xSynthetic Minor Determination

   Netting Determination

2. Source Description: Guttman Realty is obtaining a renewal Federally Enforceable PTIO. Guttman Realty, in Portage County, operates 2 loading racks (J002 and J101) and 15 storage tanks (T001 - T009, T101 - T103, and T109 - T111). The facility received fuels from a pipeline, stores the fuels in bulk storage tanks, and delivers the product to tank trucks via loading racks. The facility handles a variety of fuels, including various grades of gasoline, diesel, ethanol, and transmix. Guttman desires to limit the facility's overall VOC and HAP emissions to avoid Title V applicability and NESHAP provisions (40 CFR Part 63, Subpart R).

3. Facility Emissions and Attainment Status: Portage County is currently in attainment status for all criteria pollutants, except ozone which is in marginal non-attainment. Guttman's unrestricted potential to emit is above major source thresholds. Through this FEPTIO, Guttman is accepting facility-wide emission limitations of 88 tons VOC, 7.92 tons individual HAP, and 22.9 tons combined HAPs, per rolling 12-month summations.

4. Source Emissions: Guttman will achieve the emission reductions by restricting fuel throughputs in accordance with the following strategy:

Fuel Restriction	Cumulative Allowable Throughput Limit (gallons)	Applicable Loading Rack
Total Facility Fuel Distribution	480,320,000	BTS West - J002
		BTS East - J101
Gasoline (Total Facility)	280,000,000	BTS West - J002
		BTS East - J101
Transmix	5,000,000	BTS West - J002
Ethanol	102,000,000	BTS West - J002
		BTS East - J101
Kerosene	Limited by remaining fuel	BTS West - J002
Diesel (HSD, LSD, ULD)	Limited by remaining fuel	BTS West - J002

5. Conclusion: By restricting fuel throughput, the facility will reduce its potential to emit to less than Title V and NESHAP thresholds. The terms and conditions in the permit shall require the facility to conduct performance tests, maintain records of throughputs and fuel compositions, and submit deviation reports to ensure compliance.

6. Please provide additional notes or comments as necessary:

   This is a renewal FETPIO.

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

Pollutant	Tons Per Year
VOC	88
Individual HAP	7.92
Combined HAPs	22.9

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Renewal
Guttman Realty Company dba Bulk Terminal Storage
1521 S. CHILLICOTHE RD.,, AURORA, OH 44202
ID#:P0119922
Date of Action: 5/5/2016
Permit Desc:FEPTIO Renewal for a Bulk Terminal.
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: Kelly Kanoza, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Guttman Realty Company dba Bulk Terminal Storage

Facility ID:	1667020021
Permit Number:	P0119922
Permit Type:	Renewal
Issued:	5/5/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Guttman Realty Company dba Bulk Terminal Storage

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Authorization

Facility ID:	1667020021
Application Number(s):	A0054774
Permit Number:	P0119922
Permit Description:	FEPTIO Renewal for a Bulk Terminal
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	5/5/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Guttman Realty Company dba Bulk Terminal Storage
1521 S. CHILLICOTHE RD.
AURORA, OH 44202

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119922
Permit Description: FEPTIO Renewal for a Bulk Terminal

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:	Loading Rack
Superseded Permit Number:	P0119102
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J101**
Company Equipment ID:	Loading Rack
Superseded Permit Number:	P0119102
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T001**
Company Equipment ID:	Tank #201
Superseded Permit Number:	P0119102
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T111**
Company Equipment ID:	Storage Tank - #4
Superseded Permit Number:	P0119102
General Permit Category and Type:	Not Applicable

Group Name: Tank Group 1

Emissions Unit ID:	**T004**
Company Equipment ID:	Tank #202
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Tank #501
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable

Group Name: Tank Group 2

Emissions Unit ID:	**T005**
Company Equipment ID:	Tank #011
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T007**
Company Equipment ID:	Tank #012
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T008**
Company Equipment ID:	Tank #013
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable

Group Name: Tank Group 3

Emissions Unit ID:	**T002**
Company Equipment ID:	Tank #301
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	Tank #401
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T101**
Company Equipment ID:	Storage Tank - #1
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T102**
Company Equipment ID:	Storage Tank - #2
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T103**
Company Equipment ID:	Storage Tank - #3
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T107**
Company Equipment ID:	Storage Tank - #7
Superseded Permit Number:	P0119102
General Permit Category andType:	Not Applicable

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 Akron Regional Air Quality Management District 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) All.

2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

3. In order to avoid Title V major source permitting requirements, Guttman Realty Company dba Bulk Terminal Storage has requested the following fuel throughput, volatile organic compound (VOC), and hazardous air pollutant (HAP) limitations:

   a) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	The total fuel throughput shall not exceed the following, as a rolling, 12-month summation: 480,320,000 gallons of any fuel for both loading racks (emissions units J002 and J101) combined; 280,000,000 gallons of gasoline for both loading racks (emissions units J002 and J101) combined; 5,000,000 gallons of transmix from emissions unit J002; and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		102,000,000 gallons ethanol for both loading racks (emissions units J002 and J101) combined. The total facility-wide emissions shall not exceed the following, as a rolling, 12-month summation: 88.0 tons of VOC; 7.92 tons of any individual HAP; and 22.9 tons of total combined HAPs. See a)(2)a below.

(2) Additional Terms and Conditions

a. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing fuel throughput and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

b) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain material safety data sheets or Global Harmonization System safety data sheets (SDS) for each type of fuel loaded at the facility.

(2) The permittee shall maintain monthly records of the following information:

a. the total, individual throughput of all fuels loaded in both J002 and J101;

b. the rolling, 12-month summations of the total individual throughput of all fuels loaded in both J002 and J101, in gallons; and

c. the calculated individual HAP, combined HAP, and VOC emissions and the rolling, 12-month summations of individual HAP, combined HAP, and VOC emissions for all emissions units at the facility, in tons. Emissions shall be calculated using the methodology specified in section d)(1).

c) 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) The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Emissions unit ID	Term & Condition
Facility-Wide	B.3.a)(1)a.
J002	C.1.c)(1)
J002	C.1.c)(15)
J101	C.2.c)(1)
J101	C.2.c)(9)

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this

permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

d) Testing Requirements

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

a. Emission Limitation:

The total facility-wide emissions of VOC shall not exceed the 88.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the summation of the following emissions:

i. VOC emissions from all storage tanks at the facility shall be determined by estimating emissions using the most recent version of USEPA's Tanks computer software or the most recent emission factors for storage tanks contained in AP-42 Chapter 7;

ii. Fugitive VOC emissions from equipment leaks shall be determined by using USEPA-453/R-95-017, "Protocol for Equipment Leak Emissions Estimates";

iii. VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results for the control efficiency and the emission factor for fugitive loading of 9 mg/L (0.075 #/1000 gallons, USEPA, 1980, Bulk Gasoline Terminals Background Information for Proposed Standards, Table C-4);

iv. Loading emissions for fuels other than gasoline shall be assigned an emission rate equivalent to that of gasoline, as determined from source testing; and

v. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-3.

b. Emission Limitations:

The total facility-wide HAP emissions shall not exceed the following, as a rolling, 12-month summation:

7.92 tons of any individual HAP; and

22.9 tons of total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the maximum weight percent of each HAP in the fuel (based on the highest value for each component on the current fuel SDS) by the total VOC emission rate for the year (in tons per year)) for all emissions units at the facility, including fugitive emissions.

To determine total combined HAP emissions, sum the calculated annual emission rates of the individual HAPs.

Should more accurate emission factors be developed, the permittee shall use them provided the new emission factors are mutually agreeable to the Ohio EPA, Akron Regional Air Quality Management District (ARAQMD), and Bulk Terminal Storage.

C. Emissions Unit Terms and Conditions

1. J002, Loading Rack

Operations, Property and/or Equipment Description:

BTS West Loading Rack - petroleum loading rack controlled with enclosed flare unit - 3 truck bays with up to 12 loading arms.

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. All.

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)	Volatile organic compound (VOC) emissions shall not exceed 24.02 pounds per hour, and 27.45 tons per year (stack emissions). Fugitive VOC emissions from truck loading shall not exceed 18.04 tons per year.
b.	OAC rule 3745-21-09(Q)	VOC emissions from the vapor control system shall not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded. See c)(1) through c)(6) below.
c.	OAC rule 3745-31-05(D)	See Facility-Wide Terms and Conditions B.3.a)(1)a. above.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 60, Subpart XX [40 CFR 60.500 – 60.506]	The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [40 CFR 60.502(b)] See c)(7) through c)(12) below.
e.	40 CFR Part 60, Subpart A [40 CFR 60.1 – 60.19]	General Provisions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:

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

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

(2) The loading rack shall be equipped with a vapor control system whereby:

a. all vapors collected by the vapor collection system are vented to the vapor control system; and

b. the mass emissions of VOC from the vapor control system do not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

(3) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

(5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

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

(7) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

(8) Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

a. The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility.

b. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

c. The permittee shall cross-check each tank identification obtained in paragraph b, of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

i. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

iii. If either the quarterly or semiannual cross-check provided in paragraphs (8)c.i. through (8)c.ii. of this section reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.

d. The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph (8)c. of this section.

e. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

f. Alternate procedures to those described in paragraphs (8)a. through (8)e. of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator of USEPA.

(9) The permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(10) The permittee shall act to assure that the terminal and the truck vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks.

(11) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 Pascal (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(12) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 Pascal (450 mm of water).

(13) The vapor collection and control system shall be kept in good working order and shall be used at all times during the transfer of any fuel into tank trucks. Approval to transfer any fuel into tank trucks without vapor controls following a malfunction or during scheduled maintenance of the vapor control system shall require prior approval of the ARAQMD in accordance with OAC rule 3745-15-06.

(14) The permittee shall ensure that the owner or operator of any tank truck used in conjunction with this emissions unit has complied with the requirements of OAC rule 3745-21-09(V), if applicable, before the tank truck is loaded.

(15) A pilot flame shall be maintained in the vapor control system flare pilot light burner at all times during the transfer of fuel.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

(2) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

(3) The permittee shall properly install, operate, and maintain an interlock system to automatically shut down fuel transfer, using valves, at the loading rack in the absence of a pilot flame at the flare, and also prevent operation of the emissions unit if the device or collection system is not operating.

(4) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each instance of leak detection shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

(5) A record of each monthly leak inspection required under d)(4) of this permit shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

a. the date of inspection;

b. the findings (may include no leak(s) discovered, or the location, nature, and severity of the leak(s));

c. the leak determination method;

d. the corrective action taken, including the date each leak was repaired and the reason for any repair internal in excess of 15 days; and

e. the inspector's name and signature.

(6) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in section c)(1). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). This pressure shall be recorded on a daily basis (Monday through Friday, excluding holidays), in inches of water column.

(7) The permittee has previously submitted a preventive maintenance plan (PMP), to the ARAQMD for approval. Any subsequent changes to the PMP shall be mutually agreeable to the permittee and the ARAQMD. The PMP shall include the methods and procedures used for the vapor control system, and an annual inspection of the vapor control system. The annual inspection of the vapor control system shall be performed by an individual (company personnel or contracted consultant) trained in the operation and inspection of flares. The annual inspection report shall include all relevant information pertaining to the points of the inspection carried out during the annual inspection and shall be maintained on site and made available during subsequent inspections by the ARAQMD.

(8) The permittee shall maintain the information required by the daily operating check sheet, developed as part of the PMP, on a daily basis. The permittee has previously submitted a copy of the check sheet to the ARAQMD. Any subsequent changed to this check sheet shall be mutually agreeable to the permittee and the ARAQMD.

(9) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

(10) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information:

a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27);

b. tank owner and address;

c. tank identification number;

d. testing location;

e. date of test;

f. tester name and signature;

g. name, signature, and affiliation of witnessing inspector, if any; and

h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

(11) The permittee shall properly install, operate, and maintain a device to continuously monitor for the presence of the flare's pilot flame during the transfer of fuel. The monitoring device shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

e) Reporting Requirements

(1) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted, during the summer months when the gasoline vapor pressure is highest, within a year prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate of total organic compounds from gasoline loading.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for VOC:

Method 2A inlet vapor volume
Method 21 potential leak sources

Method 25A or 25B VOC concentration
Subpart XX [60.503(d)] tank truck maximum pressure

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

d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) 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 Limitations:

The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

VOC from the vapor control system shall not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded.

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 1 - 4, and 25A/25B of 40 CFR Part 60, Appendix A and the requirements of section f)(1).

b. Emission Limitations:

VOC emissions shall not exceed 24.02 pounds per hour, and 27.45 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation based on the results of emission testing conducted in accordance with Methods 1 - 4, and 25A/25B of 40 CFR Part 60, Appendix A and the requirements of section f)(1).

The annual limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

c. Emission Limitation:

Fugitive VOC emissions from truck loading shall not exceed 18.04 tons per year.

Applicable Compliance Method:

The annual fugitive emission limitation was developed by multiplying the maximum amount of fuel loaded per year, in gallons, by the emissions factor of 9 mg/L (0.075 #/1000 gallons, USEPA, 1980, Bulk Gasoline Terminals Background Information for Proposed Standards, Table C-4), and then dividing by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

2. J101, Loading Rack

Operations, Property and/or Equipment Description:

BTS East Loading Rack - gasoline and distillate fuel loading rack controlled with enclosed flare unit - 3 truck bays with up to 10 loading arms.

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. All.

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 3745-21-09(Q)	Volatile organic compound (VOC) emissions from the vapor control system shall not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded. See c)(1) through c)(6) below.
b.	OAC rule 3745-31-05(D)	See Facility-Wide Terms and Conditions B.3.a)(1)a. above.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:

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

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

(2) The loading rack shall be equipped with a vapor control system whereby:

a. all vapors collected by the vapor collection system are vented to the vapor control system; and

b. the mass emissions of VOC from the vapor control system do not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

(3) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

(5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

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

(7) The vapor collection and control system shall be kept in good working order and shall be used at all times during the transfer of any fuel into tank trucks. Approval to transfer any fuel into tank trucks without vapor controls following a malfunction or during scheduled maintenance of the vapor control system shall require prior approval of the ARAQMD in accordance with OAC rule 3745-15-06.

(8) The permittee shall ensure that the owner or operator of any tank truck used in conjunction with this emissions unit has complied with the requirements of OAC rule 3745-21-09(V), if applicable, before the tank truck is loaded.

(9) A pilot flame shall be maintained in the flare's pilot light burner at all times during the transfer of fuel.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

(2) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

(3) The permittee shall properly install, operate, and maintain an interlock system to automatically shut down fuel transfer, using valves, at the loading rack in the absence of a pilot flame at the flare, and also prevent operation of the emissions unit if the device or collection system is not operating.

(4) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for the total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

(5) A record of each monthly leak inspection required under d)(4) of this permit shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

a. the date of inspection;

b. the findings (may include no leak(s) discovered, or the location, nature, and severity of the leak(s));

c. the leak determination method;

d. the corrective action taken, including the date each leak was repaired and the reason for any repair internal in excess of 15 days; and

e. the inspector’s name and signature.

(6) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in section c)(1). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s). This pressure shall be recorded on a daily basis (Monday through Friday, excluding holidays), in inches of water column.

(7) The permittee has previously submitted a preventive maintenance plan (PMP), to the ARAQMD for approval. Any subsequent changes to the PMP shall be mutually agreeable to the permittee and the ARAQMD. The PMP shall include the methods and procedures used for the vapor control system, and an annual inspection of the vapor control system. The annual inspection of the vapor control system shall be performed by an individual (company personnel or contracted consultant) trained in the operation and inspection of flares. The annual inspection report shall include all relevant information pertaining to the points of the inspection carried out during the annual inspection and shall be maintained on site and made available during subsequent inspections by the ARAQMD.

(8) The permittee shall maintain the information required by the daily operating check sheet, developed as part of the PMP, on a daily basis. The permittee has previously submitted a copy of the check sheet to the ARAQMD. Any subsequent changed to this check sheet shall be mutually agreeable to the permittee and the ARAQMD.

(9) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

(10) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information:

a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27);

b. tank owner and address;

c. tank identification number;

d. testing location;

e. date of test;

f. tester name and signature;

g. name, signature, and affiliation of witnessing inspector, if any; and

h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

e) Reporting Requirements

(1) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted, during the summer months when the gasoline vapor pressure is highest, within a year prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate of total organic compounds from gasoline loading.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for VOC:

Method 2A inlet vapor volume
Method 21 potential leak sources
Method 25A or 25B VOC concentration
Subpart XX [60.503(d)] tank truck maximum pressure

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

d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under “worst case” conditions expected during the life of the permit. As part of the information provided in the “Intent to Test” notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe “worst case” operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute “worst case”. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit

and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

VOC from the vapor control system shall not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded.

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the results of emissions testing in accordance with Methods 1 - 4, and 25A/25B of 40 CFR Part 60, Appendix A and the requirements of section f)(1).

g) Miscellaneous Requirements

(1) None.

3. T001, Tank #201

Operations, Property and/or Equipment Description:

Tank #201 - 1,049,370-gallon fixed roof storage tank equipped with an internal floating roof, for all grades of gasoline, transmix, ethanol, or all grades of diesel fuel.

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. All.

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 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 3.3 tons per year. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-21-09(L)	See c)(1) below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS

pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plant (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

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

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

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

d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum 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.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall maintain monthly records of the total throughput of all stored liquids, in gallons.

e) Reporting Requirements

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

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:

VOC emissions shall not exceed 3.3 tons per year.

Applicable Compliance Method:

VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

g) Miscellaneous Requirements

(1) None.

4. T111, Storage Tank - #4

Operations, Property and/or Equipment Description:

Tank #4 - 252,000-gallon fixed roof storage tank equipped with an internal floating roof, for ethanol, kerosene, or all grades of diesel fuel.

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. All.

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)	Volatile organic compound (VOC) emissions shall not exceed 0.80 tons per year.
b.	OAC rule 3745-21-09(L)	See c)(1) below.
c.	40 CFR Part 60, Subpart Kb [40 CFR 60.110b – 60.117b]	See c)(2) below.
d.	40 CFR Part 60, Subpart A [40 CFR 60.1 – 60.19]	General Provisions

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

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

d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

(2) The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 0.508 pound per square inch absolute (3.5 kPa), unless such tank is designed or equipped in accordance with the requirements of 40 CFR 60.112b.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum 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.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall maintain monthly records of the total throughput of ethanol, in gallons.

(4) The permittee shall maintain records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel.

e) Reporting Requirements

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

(2) If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 0.508 pounds per square inch absolute (3.5 kPa), and such tank does not comply with the requirements of 40 CFR 60 Subpart K,, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.

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:

VOC emissions shall not exceed 0.80 tons per year.

Applicable Compliance Method:

VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Tank Group 1: T004, T006

EU ID	Operations, Property and/or Equipment Description
T004	Tank #202 - 999,878-gallon vertical fixed roof storage tank equipped with a submerged fill pipe, for all grades of diesel fuel or kerosene.
T006	Tank #501 - 2,023,266-gallon vertical fixed roof storage tank equipped with a submerged fill pipe for kerosene or all grades of diesel fuel.

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. All.

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 3745-21-09(L)	Exempt. See c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not place, store, or hold in these fixed roof tanks any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tanks are equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

(2) The permittee shall not store gasoline in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for each fixed roof tank:

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.

(2) The permittee shall maintain monthly records of the total throughput of fuel, in gallons.

e) Reporting Requirements

(1) If the permittee places, stores, or holds, in either of these fixed roof tanks, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Tank Group 2: T005, T007, T008

EU ID	Operations, Property and/or Equipment Description
T005	Tank #011 - 39,774 vertical fixed roof storage tank for kerosene or all grades of diesel fuel
T007	Tank #012 - 19,766-gallon horizontal fixed roof storage tank for kerosene or all grades of diesel fuel, equipped with a submerged fill pipe.
T008	Tank #013 - 19,681-gallon horizontal fixed roof storage tank for kerosene or all grades of diesel fuel, equipped with a submerged fill pipe.

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. All.

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 3745-21-09(L)	Exempt. See b)(2)a. below.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(L)(2), fixed roof tanks with a capacity less than 40,000 gallons are exempt from paragraph (L)(1) of this rule.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Tank Group 3: T002, T003, T101, T102, T103, T107

EU ID	Operations, Property and/or Equipment Description
T002	Tank #301 - 1,195,572 gallon fixed roof storage tank with an internal floating roof for all grades of gasoline, transmix, ethanol, kerosene, or all grades of diesel fuel
T003	Tank #401 - 1,894,662 gallon fixed roof storage tank with an internal floating roof for all grades of gasoline, transmix, ethanol, kerosene, or all grades of diesel fuel.
T101	Tank #1 - 1,673,868-gallon fixed roof storage tank equipped with an internal floating roof, for all grades of gasoline, transmix, ethanol, kerosene, or all grades of diesel fuel.
T102	Tank #2 - 2,094,000-gallon fixed roof storage tank equipped with an internal floating roof for kerosene or all grades of diesel fuel.
T103	Tank #3 - 2,094,000-gallon fixed roof storage tank equipped with an internal floating roof for gasoline, transmix, ethanol, kerosene, or all grades of diesel fuel.
T107	Tank #7- 1,242,000-gallon fixed roof storage tank equipped with an internal floating roof for gasoline, transmix, ethanol, kerosene, or all grades of diesel fuel

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. All.

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 3745-21-09(L)	See c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tanks shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

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

d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for each fixed roof tank:

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.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall maintain monthly records of the total throughput of all stored liquids, in gallons.

e) Reporting Requirements

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

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.