

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 16-02517

A. Source Description

Sunoco Partners Marketing & Terminals L.P. - Akron, in Summit County, has an issued federally enforceable state operating permit (FESOP) for a loading rack (J001) and nine storage tanks (T001, T003 (includes two storage tanks), T008, T009, T010, T011, T012, and T013). The facility receives fuels from a pipeline, stores the fuels in bulk storage tanks, and delivers the product to tank trucks via a loading rack. The facility handles a variety of fuels, including various grades of gasoline, distillate fuel oil, kerosene, and transmix. Sunoco has proposed to change the control equipment on the loading rack (J001) from a carbon adsorber to an enclosed flare which will have potential emissions for carbon monoxide (CO) of above the Title V threshold.

B. Facility Emissions and Attainment Status

Sunoco's facility potential to emit for volatile organic compounds (VOC), each individual hazardous air pollutant (HAP) and combined HAPs is limited to below 100.0, 10.0 and 25.0 tons, respectively, in the current FESOP. The installation of the enclosed flare will have a potential to emit for CO of 132 tons per year. Summit County is non attainment for ozone.

C. Source Emissions

Sunoco has proposed to continue to restrict their annual gasoline (including additive), distillates, and transmix throughput to 200,000,000 gallons, 180,000,000, and 200,000 per rolling 12-month period, respectively, for the loading rack (J001). These throughput restrictions will limit Sunoco's VOC emissions, each individual HAP, and combined HAPs to 99.9 tons per year, 9.9 tons per year, and 24.9 tons per year, respectively, for the entire facility. The throughput limits will also limit the CO emissions to 15.9 tons per year for the enclosed flare.

D. Conclusion

With the throughput limitations on the loading rack (J001), Sunoco's potential to emit for VOC, CO, each individual HAP, and combined HAPs will be below Title V thresholds. To ensure compliance, Sunoco will maintain monthly records of the throughput for each product type and submit annual reports for the VOC, the CO, each individual HAP, and combined HAPs emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 16-02517

Fac ID: 1677010377

DATE: 4/24/2008

Sunoco Partners Marketing and Terminals
John Berndt
999 Home Avenue
Akron, OH 44310

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1250** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

Akron Metro Area Trans. Study

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02517 FOR AN AIR CONTAMINANT SOURCE
FOR Sunoco Partners Marketing and Terminals**

On 4/24/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sunoco Partners Marketing and Terminals**, located at **999 Home Ave, Akron, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02517:

Emission Control Equipment Replacement for Loading Rack J001.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02517

Application Number: 16-02517
Facility ID: 1677010377
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sunoco Partners Marketing and Terminals
Person to Contact: John Berndt
Address: 999 Home Avenue
Akron, OH 44310

Location of proposed air contaminant source(s) [emissions unit(s)]:
**999 Home Ave
Akron, Ohio**

Description of proposed emissions unit(s):
Emission Control Equipment Replacement for Loading Rack J001.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Chris Korleski
Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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 party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC for the entire facility	99.9
each individual HAP for the entire facility	9.9
combined HAPs for the entire facility	24.9
carbon monoxide	15.9

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(J001) - Distillate and gasoline loading rack and a vapor combustion unit as control.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>30.0 pounds of carbon monoxide (CO) per hour from the vapor combustion unit (enclosed flare)</p> <p>The CO emissions from the vapor control system shall not exceed 0.0835 pound of CO per 1000 gallons of fuel loaded (gasoline and distillates).</p>
OAC rule 3745-31-05(A)(3)(b)	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide (SO₂) emissions and particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for SO₂ and PE is each less than ten tons per year.</p> <p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides (NO_x) emissions from this air contaminant source since the calculated annual emission rate for NO_x is less than ten tons per year taking into account the federally enforceable throughput limitations established under OAC rule 3745-31-05(C).</p>
OAC 3745-21-09 (Q)	<p>The volatile organic compounds (VOC) emissions from the vapor control system shall not exceed 0.67 pound of VOC per 1000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.</p>

<p>OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements under 40 CFR Part 63, Subpart R)</p>	<p>The combined annual emissions from all facility emissions units, including permit to install exempt and "de minimis" emissions units, shall not exceed the following as rolling, 12-month summations:</p> <p>99.9 tons of VOC per year;</p> <p>24.9 tons of combined hazardous air pollutants (HAPs) per year; and</p> <p>9.9 tons of any individual HAP per year.</p> <p>The emissions of CO from the vapor control system unit shall not exceed 15.9 tons per year, based upon a rolling, 12-month summation.</p> <p>See B.8. below.</p>
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2. Additional Terms and Conditions

- 2.a** The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, as rolling, 12-month summations.
- 2.b** The hourly CO emission limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and reporting requirements are necessary to demonstrate compliance with this emission limitation.

B. 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:

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- a. all vapors collected by the vapor collection system are vented to the vapor control system; and
 - b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
3. A means shall be provided 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 in sewers, stored in open containers or handled in any other manner that would result in evaporation.
 6. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system 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. A pilot flame shall be maintained at all times in the flare's pilot light burner during the transfer of gasoline.
 8. Compliance with the above-mentioned emission limitations shall be achieved by restricting gasoline (i.e., gasoline and additive) and distillates (i.e., kerosene and diesel fuel) throughputs for the truck loading rack (J001), and transmix throughput for truck loading from the storage tank (T013). The maximum annual throughputs of gasoline, distillates, and transmix shall not exceed 200,000,000 gallons, 180,000,000 gallons, and 600,000 gallons, respectively, based upon a rolling, 12-month summation of the monthly throughput rates.

Initial compliance with throughput restrictions shall be determined by reference to data for the twelve months preceding the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device

Emissions Unit ID: **J001**

and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall properly install, operate, and maintain an interlock system to automatically shut down fuel transfer 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.

2. The permittee shall record all periods of time during which there was no pilot flame or the flare was inoperable.
3. 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 B.1.b. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure in the vapor collection system on a daily basis (i.e., Monday through Friday while the operation is manned).
4. The permittee shall perform monthly monitoring all potential sources of vapor leaks from the terminal's vapor collection system and vapor control system while a gasoline tank truck is being loaded. Where vapor leaks are determined to be 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, 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.

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These records shall be retained and accessible for a period of 5 years.

5. The permittee shall maintain monthly records of the following information for this emissions unit and emissions unit T013 (for transmix truck loading):
 - a. the total throughputs of gasoline, each individual type of distillate (i.e., kerosene, jet fuel, etc.), combined distillates (sum of the individual types of distillates), and transmix, in gallons per month; and
 - b. the rolling, 12-month total throughputs of gasoline, distillates, and transmix, in gallons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month gasoline, distillate fuels, and transmix gallon throughput restrictions of 200,000,000, 180,000,000 and 600,000, respectively (for this emissions unit and emissions unit T013).
2. The permittee shall submit quarterly deviation reports that identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.
3. The permittee shall submit quarterly pressure deviation (excursion) reports that identify all daily records which indicate that the pressure in the vapor collection system did not comply with the allowable range of minus 6 to plus 18 inches of water gauge pressure specified in B.1.b.
4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.
5. 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.

Emissions Unit ID: **J001**

6. The permittee shall submit annual reports which summarize the following:
 - a. the total actual emissions of each individual HAP, combined HAPs, CO, and VOC from the entire facility; and
 - b. the total annual throughputs of gasoline and distillates for the truck loading rack (J001) and the total annual throughput of transmix for the truck loading from the storage tank (T013).

These annual reports shall be submitted by April 15 of each year, and shall cover the previous calendar year.

E. 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 within 90 days of startup of the vapor combustion unit (enclosed flare).
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC in pound of VOC per 1000 gallons (milligrams of VOC per liter) of gasoline loaded.
 - c. The VOC emission rates shall be determined in accordance with the methods and procedures contained in 40 CFR Part 60.503(b) and (c) of "Subpart XX - Standards of Performance for Bulk Gasoline Terminals," except that the gasoline throughput during any test shall be not less than ninety per cent of the maximum throughput of the loading rack(s) and not less than eight thousand gallon as described below in paragraphs 1.c.i through 1.c.ii.
 - i. Immediately before the performance test required to determined compliance, the permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.
 - ii. The permittee shall determine compliance as follows:
 - (a) The performance test shall be 6 hours long during which at least

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80,000 gallons of gasoline is loaded. If this is not possible, the test may be continued the same day until 80,000 gallons of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 80,000 gallon criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

- (b) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.
- (c) The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K \times \text{the summation of } [(V_{esi} \times C_{ei}) / (L \times 10^6)] \text{ from } i=1 \text{ to } n$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{esi} = volume of air-vapor mixture exhausted at each interval "i", scm.

C_{ei} = concentration of total organic compounds at each interval "i", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.

i = emission testing interval of 5 minutes.

K = density of calibration gas, 1.83×10^6 for propane and 2.41×10^6 for butane, mg/scm.

- (d) The performance test shall be conducted in intervals of 5 minutes.

Emissions Unit ID: J001

For each interval "i", readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

- (e) The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:
 - (i) Method 2B shall be used for combustion vapor processing systems.
 - (ii) Method 2A shall be used for all other vapor processing systems.
 - (f) Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.
 - (g) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.
- d. During any test, all loading racks shall be open for each product line which is controlled by the system under test. Simultaneous use of more than one loading rack shall occur to the extent that such use would normally occur.
 - e. Simultaneous use of more than one dispenser on each loading rack shall occur to the extent that such use would normally occur.
 - f. Dispensing rates shall be set at the maximum rate at which the equipment is typically operated. Automatic product dispensers are to be used according to normal operating practices.
 - g. Applicable operating parameters of the vapor control system shall be monitored to demonstrate that the control unit is operating at design levels. Delivery

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devices shall be leak free.

- h. For each gasoline tank truck loaded during the test period, all potential sources of leaks shall be checked in accordance with the method specified in paragraph 1.j below. The tank identification number, the latest leak check certification date, and the location and highest detector reading for each incident of leakage shall be recorded.
- i. During each test, all potential sources of leaks in the vapor collection and control systems shall be monitored in accordance with the method specified in paragraph 1.j below. The location and highest detector reading for each incident of leakage shall be recorded.
- j. This method describes the procedures to be followed for detecting leaks of gasoline vapors by means of a portable hydrocarbon gas analyzer, which is calibrated to read in per cent of the lower explosive limit as propane.
 - i. The following equipment are used:
 - (a) A liquid manometer, or equivalent device, capable of measuring up to twenty-five inches of water gauge pressure with a precision of plus or minus 0.1 inch of water; and
 - (b) A portable hydrocarbon gas analyzer which:
 - (i) Is equipped with a sampling line of sufficient length for easy maneuverability during testing and a sampling probe having an internal diameter of 0.25 inch;
 - (ii) Is certified as safe for operation in explosive atmospheres;
 - (iii) Has a minimum range of zero to one hundred per cent of the lower explosive limit as propane; and
 - (iv) Has a response time for full-scale deflection of less than eight seconds with sampling line and probe attached.
 - ii. The portable hydrocarbon gas analyzer is calibrated with 2.2 per cent propane by volume in air (or equivalent calibration gas) for one hundred per cent of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

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- iii. The test procedures for detecting leaks are the following:
 - (a) Connect the liquid manometer to a pressure tap in the vapor control system, vapor collection system, or the vapor balance system as close as possible to the connection with the gasoline tank truck;
 - (b) Record the pressure periodically during loading of the gasoline tank truck;
 - (c) Check with the portable hydrocarbon gas analyzer all potential leak sources on the gasoline tank truck during loading and on the vapor control system, vapor collection system, or vapor balance system by:
 - (i) Maintaining the probe's inlet about one inch from the potential leak source in the path of (parallel to) the vapor flow from a leak;
 - (ii) Moving the probe slowly around the periphery of the potential leak source to locate the point of highest meter response;
 - (iii) Blocking as much as possible the wind from the area being monitored; and
 - (d) Record the location of leakage and the highest detector reading for each incidence of leakage.
- 2. 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).
- 3. 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

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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.

4. 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).
5. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

0.67 pound of VOC per 1000 gallons of gasoline loaded into the delivery vessel

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Applicable Compliance Method:

Compliance with the pound VOC per 1000 gallons of gasoline loaded emission limitation above shall be based upon the results of emission tests conducted in accordance with the procedures outlined in sections E.1 thru E.4 of this permit.

b. Emission Limitation:

99.9 tons of VOC per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be based upon the records required pursuant to section C.5 of these terms and conditions, and shall be determined as follows:

- i. Storage Tanks* - VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.
- ii. Fugitive - The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using the emission factors from Table 2-3 in EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" document.
- iii. Gasoline Truck Loading - The VOC emissions from gasoline truck loading shall be determined from the most recent VOC stack test results for the outlet of the control equipment, in mg/liter of gasoline loaded plus a vapor-tightness loss rate of 9.0 mg/liter of gasoline loaded from the trucks. The 9.0 mg/liter leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4 and letter dated April 13, 1995 to Karin Ritter of the American Petroleum Institute from Radian Corporation).
- iv. Transmix Truck Loading - The VOC emissions from transmix truck loading shall be determined using the following AP-42 emission factor: 5 pounds of VOC per 1000 gallons of transmix loaded (AP-42, Fifth Edition, Table 5.2-5, dated January 1995).
- v. Distillate Loading - The VOC emissions from distillate loading shall be determined using emission factors in AP-42, Fifth Edition, Table 5.2-5,

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dated January 1995.

- vi. Exempt and de minimis Units - The VOC emissions from permit to install exempt and "de minimis" emissions units shall be determined using approved methods (i.e., for boilers AP-42 Chapter 1.4 and for storage tanks the most current version of USEPA's "Tanks" program).
- vii. Total VOC emissions - sum i + ii + iii + iv + v + vi, and then dividing by 2000 pounds per ton.

* VOC emissions from storage tanks shall be based on the record keeping requirements contained in section C of emissions units T001, T003, T008, T009, T010, T011, T012, and T013.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, Akron Regional Air Quality Management District, and the permittee.

c. Emission Limitations:

24.9 tons of combined HAPs per year as a rolling, 12-month summation

9.9 tons of any individual HAP per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the records required pursuant to section C.5 of these terms and conditions, and shall be determined as follows:

- i. Gasoline Truck Loading - The individual HAP emissions from gasoline truck loading shall be determined using emission factors derived from the emission factor calculations outlined in Section 5 of API Publication 347, October 1988. The emission factor shall be as follows:
 - (a) benzene - 1.2E-07 pound of benzene emissions per gallon of gasoline loaded;
 - (b) toluene - 1.7E-06 pound of toluene emissions per gallon of gasoline loaded;

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- (c) xylene - 9.2E-06 pound of xylene emissions per gallon of gasoline loaded;
- (d) ethylbenzene - 1.4E-06 pound of ethylbenzene emissions per gallon of gasoline loaded;
- (e) isooctane - 1.9E-06 pound of isooctane emissions per gallon of gasoline loaded; and
- (f) hexane - 4.9e-07 pound of hexane emissions per gallon of gasoline loaded.

These emission factors are based on an uncontrolled emission factor of 980 mg/l from AP-42 Table 5.2-5, dated 1/95, the average control efficiency's of HAP from Table 4-3 of API Publication 347, and liquid weight percents as listed in 5.c.vi below.

- ii. Distillate Truck Loading (diesel and heating oil) - The individual HAP emissions from distillate truck loading associated with diesel and heating oil shall be calculated by taking the product of the total VOC emission rate for distillate truck loading associated with diesel and heating oil and the vapor weight percents as follows:
 - (a) benzene - 0.1884 pound of benzene per pound of VOC emissions;
 - (b) cumene - 0.0084 pound of cumene per pound of VOC emissions;
 - (c) toluene - 0.1184 pound of toluene per pound of VOC emissions;
 - (d) xylene - 0.1139 pound of xylene per pound of VOC emissions;
 - (e) ethylbenzene - 0.0238 pound of ethylbenzene per pound of VOC emissions; and
 - (f) hexane - 0.0572 pound of hexane per pound of VOC emissions.

The vapor weight percents were determined using equations 4-3, 4-4, 4-5, and 4-6 from AP-42 section 7.1.4, dated 9/97, and the liquid weight percents taken from Table 3-1 of API Publication 1673.

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- iii. Distillate Truck Loading (kerosene and jet fuel) - The individual HAP emissions from distillate truck loading associated with kerosene and jet fuel shall be calculated by taking the product of the total VOC emission rate for distillate truck loading associated with kerosene and jet fuel and the vapor weight percents as follows:
- (a) benzene - 0.0574 pound of benzene per pound of VOC emissions;
 - (b) cumene - 0.0038 pound of cumene per pound of VOC emissions;
 - (c) naphthalene - 0.0087 pound of naphthalene per pound of VOC emissions;
 - (d) toluene - 0.0772 pound of toluene per pound of VOC emissions;
 - (e) xylene - 0.1115 pound of xylene per pound of VOC emissions;
 - (f) ethylbenzene - 0.02075 pound of ethylbenzene per pound of VOC emissions; and
 - (g) hexane - 0.1462 pound of hexane per pound of VOC emissions.

The vapor weight percents were determined using equations 4-3, 4-4, 4-5, and 4-6 from AP-42 section 7.1.4, dated 9/97, and the liquid weight percents taken from Table 3-1 of API Publication 1673.

- iv. Transmix Truck Loading - The individual HAP emissions from transmix truck loading shall be calculated by taking the product of the total VOC emission rate and the HAP to VOC content (%). The HAP to VOC contents shall be as listed in Table 5-5 of API Publication 347, October 1988 and as listed in Table C-5 of the Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards (EPA 453/R-94-002a):
- (a) benzene - 0.7%
 - (b) toluene - 1.1%
 - (c) ethylbenzene - 0.1%
 - (d) xylene - 0.4%

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- (e) hexane - 1.4%
 - (f) isooctane - 0.7%
- v. Gasoline Truck Loading (vapor tightness loss) - The individual HAP emissions from the gasoline truck loading shall be calculated by taking the product of the total VOC emissions and the HAP to VOC content (%). The HAP to VOC contents shall be as listed in Table 5-5 of API Publication 347, October 1988 and as listed in Table C-5 of the Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards (EPA 453/R-94-002a):
- (a) benzene - 0.7%
 - (b) toluene - 1.1%
 - (c) ethylbenzene - 0.1%
 - (d) xylene - 0.4%
 - (e) hexane - 1.4%
 - (f) isooctane - 0.7%
- vi. Fugitive - The individual HAP emissions from fugitive emissions shall be calculated by taking the product of the total VOC emission rate and the liquid weight of each HAP in gasoline. The liquid weight percents shall be based off of potential estimates as follows;
- (a) benzene - 4.8%
 - (b) cumene - 5%
 - (c) naphthalene - 5%
 - (d) toluene - 30%
 - (e) xylene - 25%
 - (f) ethylbenzene - 5%

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- (g) isooctane - 5%
- (h) hexane - 5%
- vii. Storage Tanks* - The individual HAP emissions from storage tanks shall be calculated using the partial speciation function of the most recent version of USEPA's "Tanks" program.
- viii. Exempt and de minimis Units - The individual HAP emissions from permit to install exempt and "de minimis" emissions units shall be determined using approved methods (i.e., for boilers AP-42 Chapter 1.4 and for storage tanks using the partial speciation function of the most recent version of USEPA's "Tanks" program).
- ix. For each individual HAP, sum i + ii + iii + iv + v + vi + vii + viii, and then dividing by 2000 pounds per ton. For combined HAPs emissions, sum all the individual HAP emissions.

* VOC emissions from storage tanks shall be based on the record keeping requirements contained in section C of emissions units T001, T003, T008, T009, T010, T011, T012, and T013.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, Akron Regional Air Quality Management District, and the permittee.

d. Emission Limitation:

30.0 pounds of CO per hour from the vapor combustion unit

Applicable Compliance Method:

Compliance with the hourly allowable CO limitation above shall be demonstrated by multiplying the CO emission factor of 0.0000835 pound of CO per gallon of fuel loaded by the maximum fuel throughput rate (360,000 gallons per hour).

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 10 or 10B, as appropriate, of 40 CFR Part 60,

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Appendix A.

e. Emission Limitation:

The CO emissions from the vapor control system shall not exceed 0.0835 pound of CO per 1000 gallons of fuel loaded (gasoline and distillates).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 10 or 10B, as appropriate, of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

The emissions of CO from the vapor control system unit shall not exceed 15.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual allowable CO limitation above shall be demonstrated by multiplying the CO emission factor of 0.0000835 pound of CO per gallon of fuel loaded by the maximum annual fuel throughput rate for distillates and gasoline (380,000,000 gallons per year) and then dividing by 2000 pounds per ton and through record keeping requirements established in section C.5 of this permit.

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1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.