Ohio Environmental Protection Agency

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

Certified Mail

5/13/2016

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

Alyssa Laird
Sunoco Partners Marketing & Terminals LP
1734 Old Route 66
Delmont, PA 15626

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318002698
Permit Number: P0120541
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

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

If you have any questions regarding your permit, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: CDAQ

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sunoco Partners Marketing & Terminals LP

Facility ID:	1318002698
Permit Number:	P0120541
Permit Type:	Administrative Modification
Issued:	5/13/2016
Effective:	5/13/2016
Expiration:	8/16/2018

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sunoco Partners Marketing & Terminals LP

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Authorization

Facility ID:	1318002698
Application Number(s):	M0003892
Permit Number:	P0120541
Permit Description:	FEPTIO Administrative Modification to remove language from the permit that references quarterly CGAs/RATAs as mandated by MACT regulations because this facility is not subject to MACT.
Permit Type:	Administrative Modification
Permit Fee:	$200.00
Issue Date:	5/13/2016
Effective Date:	5/13/2016
Expiration Date:	8/16/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Sunoco Partners Marketing & Terminals LP
3200 Independance Road
Cleveland, OH 44105

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:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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: P0120541
Permit Description: FEPTIO Administrative Modification to remove language from the permit that references quarterly CGAs/RATAs as mandated by MACT regulations because this facility is not subject to MACT.

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

Emissions Unit ID:	**J001**
Company Equipment ID:	Truck Loading Rack
Superseded Permit Number:	P0112003
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J002**
Company Equipment ID:	Distillate Loading Rack
Superseded Permit Number:	P0112003
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T009**
Company Equipment ID:	Storage Tank #67
Superseded Permit Number:	P0112003
General Permit Category and Type:	Not Applicable

Group Name: Storage Tanks

Emissions Unit ID:	**T001**
Company Equipment ID:	Storage Tank #1
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	Storage Tank #4
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T004**
Company Equipment ID:	Storage Tank #36
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T005**
Company Equipment ID:	Storage Tank #52
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Storage Tank #57
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T008**
Company Equipment ID:	Storage Tank # 62
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T010**
Company Equipment ID:	Storage Tank #63
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**T011**
Company Equipment ID:	Storage Tank #64
Superseded Permit Number:	P0112003
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T043**
Company Equipment ID:	Storage Tank #61
Superseded Permit Number:	P0112003
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 [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

Again, you cannot resume operation of any emissions unit certified by the authorized official as 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) c), d), e), f), and g)

   c) 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)(1)(b)	Total facility VOC emissions shall not exceed 66.9 tons per rolling, 12-month period. See c)(2) below.

      (2) Additional Terms and Conditions

         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 individual HAP and 24.9 tons/year for total combined HAPs, as rolling, 12-month summations.

         b. The facility-wide VOC and HAP restrictions apply to all emissions units that generate VOC and HAP emissions at this facility including permitted emissions units, De Minimis, and OAC rule 3745-31-03(A)(1) exempt emissions units.

         c. Each continuous VOC monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

d) Operational Restrictions

(1) Compliance with the above-mentioned emission limitations shall be achieved by restricting gasoline (i.e. gasoline (high and low grade), ethanol and associated additives) and distillate (i.e. jet fuel, Ultra Low Sulfur Diesel (ULSD), transmix and associated additives) throughputs. The maximum annual throughput of gasoline and distillate shall not exceed 500,000,000 and 200,000,000 gallons respectively, based upon a rolling, 12-month summation of the throughput amounts.

e) Monitoring and/or Recordkeeping Requirements

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

a. the total throughput of gasoline, in gallons;

b. the total throughput of distillate, in gallons;

c. the rolling, 12-month summation of the total throughput of gasoline, in gallons; and

d. the rolling, 12-month summation of the total throughput of distillate, in gallons.

(2) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous volatile organic compound (VOC) monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate). The letter(s)/document(s) of certification shall be made available to the Cleveland Division of Air Quality upon request.

(3) The permittee shall operate and maintain equipment to continuously monitor and record volatile organic compound (VOC) emissions from this emissions unit in units of the applicable standard(s), using the detection principle of the reference method specified in the regulation(s) or this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

a. emissions of VOCs in units of the applicable standard(s) in the appropriate averaging period;

b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments; hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;

c. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;

d. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous VOC monitoring system; as well as,

e. the reason (if known) and the corrective actions taken (if any) for each such event in (c) and (d).

f) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

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

(3) The permittee shall submit quarterly deviation (excursion) reports for the following emissions units 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:

i. an identification for each month during which the rolling, 12-month gasoline/petroleum liquids throughput exceeded 500,000,000 gal/yr based on a rolling, 12-month summation; and

ii. an identification for each month during which the rolling, 12-month distillate/petroleum liquids throughput exceeded 200,000,000 gal/yr based on a rolling, 12-month summation;

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Cleveland Division of Air Quality.

(4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous VOC monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland Division of Air Quality, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

   i. the facility name and address;

   ii. the manufacturer and model number of the continuous VOC and other associated monitors;

   iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

   iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

   v. the total VOC emissions for the calendar quarter (tons);

   vi. the total operating time (hours) of the emissions unit;

   vii. the total operating time of the continuous VOC monitoring system while the emissions unit was in operation;

   viii. the date, time, and duration of any/each malfunction** of the continuous VOC monitoring system, emissions unit, and/or control equipment;

   ix. the date, time, and duration of any downtime** of the continuous VOC monitoring system and/or control equipment while the emissions unit was in operation; and

   x. the reason (if known) and the corrective actions taken (if any) for each event in (b)(viii) and (ix).

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

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

** Each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit.

g) Testing Requirements

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

a. Emission Limitation:
Facility-wide VOC emissions shall not exceed 66.9 tons per rolling, 12-month period (see c)(2)b.).

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in e)(1) above and the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "TANKS" software program.

ii. VOC emissions from gasoline truck loading shall be determined using the formula L_L= 12.46 x (SPM/T) x (1-eff/100) from AP-42 Section 5.2 Transportation And Marketing Of Petroleum Liquids

Where:

L_L = loading loss, pounds per 1000 gallons (lb/1000 gal) of liquid loaded
S = a saturation factor (see Table 5.2-1 in AP-42)
P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia)
M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole)
T = temperature of bulk liquid loaded, °R (°F + 460)

Alternatively, use the emission factor from the most recent emissions test that demonstrated compliance.

iii. The VOC emissions from fugitive emissions (e.g., valves, fittings, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

b. Emission Limitation:
9.9 tons individual HAP emissions per rolling, 12-month period for this facility (see c)(2)b.).

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in e)(1) above. The HAP emissions from gasoline truck loading and storage shall be determined using the following emissions factors:

i. benzene - 0.012 pound of benzene emissions per pound of VOC emissions;

ii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;

iii. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;

iv. ethylbenzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

v. n-hexane - 0.0168 pound of n-hexane per pound of VOC emissions; and

vi. Cumene - 0.0001 pound of cumene per pound of VOC emissions

These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th edition, Section 7.1.4, Hazardous Air Pollutant (HAP) Speciation Methodology.

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, the Cleveland Division of Air Quality, and the Sunoco Partners Marketing & Terminals LP.

The HAP emissions from gasoline truck loading and storage, and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

c. Emission Limitation:
24.9 tons combined HAP emissions per rolling, 12-month period for this facility (see c)(2)b.)

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in e)(1) above and by summing the amount of each individual HAP per rolling, 12-month period.

(2) Ongoing compliance with the VOC emissions limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

h) Miscellaneous Requirements

(1) All the emissions units were installed prior to 1974 except emissions unit T009.

(2) The following tests were performed on:

a. July 14,2011, to confirm proper operation of the VRU and verify compliance with applicable VOC air emission requirements, and result was determined to be 0.70 mg/liter; and leak test was conducted on the 13th of July, 2011 and no leaks above 500 PPM were found.

b. July 7th - July 13th, 2011: VOC Continuous Emissions Monitoring Systems (CEMS): Seven Day Drift Test, and were determined to be in compliance. July 14, 2011: Relative Accuracy Test Audit was also performed and determined to be in the required range.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart *BBBBBB*, National Emission Standards for Hazardous Air Pollutants (NESHAP) for *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities* Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, 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 this rule are in effect and shall be enforced 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.

C. Emissions Unit Terms and Conditions

1. J001, Truck Loading Rack

Operations, Property and/or Equipment Description:

Truck Loading Rack for gasoline, controlled by a carbon adsorber Vapor Recovery Unit (VRU).

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

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

a. None.

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

a. b)(1)a., and f)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT	Facility-wide VOC and HAP emission limitations, see Section B above. VOC emissions from the vapor control system shall not exceed 10 mg/L and 8.345E-5 lb/gallons of gasoline loaded. See b)(2)a. below.
b.	OAC rule 3745-21-09 (Q)	e VOC emission limit specified by this rule is less stringent than the VOC emission limit established pursuant to OAC rule 3745-31-05(D)(1)(b). See b)(2) and c) below.

(2) Additional Terms and Conditions

a. This emission limit applies to the processing of high and low grade gasoline, ethanol, and associated additives.

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

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

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

c. The loading rack shall be equipped with a vapor control system whereby:

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

ii. 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.

d. All of the VOC emissions from this emissions unit shall be vented to the carbon adsorber that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c) Operational Restrictions

(1) The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any product into tank trucks.

(2) 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.

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

(4) 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.

(5) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly 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 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average VOC concentration (in ppm) of the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not be more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s), controlled by the carbon adsorber, was/were in compliance.

(4) The permittee shall properly operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases from the carbon adsorber when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9 and shall be capable of accurately measuring the VOC concentration. The organic monitoring device and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

(5) The permittee shall properly operate, and maintain a continuous flow monitoring device and recorder that measures and records the flow rate of the exhaust gases from the carbon adsorber when the emissions unit is in operation, including periods of startup and shutdown. The flow monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6. The flow monitoring device and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

(6) Prior to the initial compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9 and that the flow monitoring device and recorder satisfy the requirements of Performance Specification 6.

(7) The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the carbon adsorber was/were in operation, during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, carbon adsorber, monitoring equipment, and the associated emissions unit(s).

(8) Whenever the monitored average VOC concentration of the exhaust gases from the carbon adsorber deviates from the limit/range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the VOC concentration of the exhaust gases from the carbon adsorber immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

(2) 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 Cleveland Division of Air Quality (the Cleveland DAQ) 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.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the carbon adsorber during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average VOC concentration of the exhaust gases from the carbon adsorber exceeded the acceptable limit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the carbon adsorber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the VOC concentration of the exhaust gases into compliance with the acceptable limit, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

f) Testing Requirements

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

a. Emission Limitation:
VOC emissions from the vapor control device shall not exceed 10 mg/L and 8.345E-5 lb/gallons (includes high and low grade gasoline, ethanol, and associated additives).

Applicable Compliance Method:
Compliance shall be determined in accordance with f)(2) below.

(2) 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 12 months prior to permit renewal during the summer months when the gasoline vapor pressure is highest.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.

c. The following test methods and procedures from 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable VOC mass emission rate(s):

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

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

e. The VRU parameters for which acceptable operating ranges have been established above shall be recorded during the test, in a manner acceptable to the Cleveland DAQ, to verify continued acceptability.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

g. Personnel from the Cleveland DAQ 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.

h. 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 Cleveland DAQ within 30 days following completion of the test(s).

g) Miscellaneous Requirements

(1) None.

2. J002, Distillate Loading Rack

Operations, Property and/or Equipment Description:

Distillate Loading Rack, controlled by a carbon adsorber Vapor Recovery Unit (VRU).

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

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

a. None.

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

a. b)(1)a., and f)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT	Facility-wide VOC and HAP emission limitations, see Section B above. VOC emissions from the vapor control system shall not exceed 10 mg/L and 8.345E-5 lb/gallons material loaded. See b)(2)a. below.
b.	OAC rule 3745-21-09 (Q)	e VOC emission limit specified by this rule is less stringent than the VOC emission limit established pursuant to OAC rule 3745-31-05(D)(1)(b). See b)(2) and c) below.

(2) Additional Terms and Conditions

a. This emission limit applies to the processing of distillate which includes jet fuel, ultralow sulfur diesel, transmix and associated additives.

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

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

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

c. The loading rack shall be equipped with a vapor control system whereby:

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

ii. 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.

d. All of the VOC emissions from this emissions unit shall be vented to the carbon adsorber that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c) Operational Restrictions

(1) The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any product into tank trucks.

(2) 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.

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

(4) The permittee shall prohibit gasoline to be spilled, discharged into sewers, stored in open containers or handled in any other manner that would result in evaporation.

(5) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly 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 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average VOC concentration (in ppm) of the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not be more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s), controlled by the carbon adsorber, was/were in compliance.

(4) The permittee shall properly operate, and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases from the carbon adsorber when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9 and shall be capable of accurately measuring the VOC concentration. The organic monitoring device and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

(5) The permittee shall properly operate, and maintain a continuous flow monitoring device and recorder that measures and records the flow rate of the exhaust gases from the carbon adsorber when the emissions unit is in operation, including periods of startup and shutdown. The flow monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6. The flow monitoring device and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

(6) Prior to the initial compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9 and that the flow monitoring device and recorder satisfy the requirements of Performance Specification 6.

(7) The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the carbon adsorber was/were in operation, during which the average VOC concentration in

the exhaust gases was more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, carbon adsorber, monitoring equipment, and the associated emissions unit(s).

(8) Whenever the monitored average VOC concentration of the exhaust gases from the carbon adsorber deviates from the limit/range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the VOC concentration of the exhaust gases from the carbon adsorber immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

(2) 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 Cleveland DAQ 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

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the carbon adsorber during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average VOC concentration of the exhaust gases from the carbon adsorber exceeded the acceptable limit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the carbon adsorber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the VOC concentration of the exhaust gases into compliance with the acceptable limit, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

f) Testing Requirements

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

a. <u>Emission Limitation</u>:
VOC emissions from the vapor control device shall not exceed 10 mg/L and 8.345E-5 lb/gallons (includes jet fuel, ultralow sulfur diesel, transmix, and associated additives).

<u>Applicable Compliance Method</u>:
Compliance shall be determined in accordance with f)(2) below.

(2) 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 12 months prior to permit renewal during the summer months when the gasoline vapor pressure is highest.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.

c. The following test methods and procedures from 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable VOC mass emission rate(s):

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

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

e. The VRU parameters for which acceptable operating ranges have been established above shall be recorded during the test, in a manner acceptable to the Cleveland DAQ, to verify continued acceptability.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

g. Personnel from the Cleveland DAQ 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.

h. 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 Cleveland DAQ within 30 days following completion of the test(s).

g) Miscellaneous Requirements

(1) None.

3. T009, Storage Tank #67

Operations, Property and/or Equipment Description:

99,120 gallon transmix storage tank (89,418 gallon working volume).

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

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

a. None.

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

a. b)(1)c.

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) PTI 13-069 issued 1975	The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(L).
b.	OAC rule 3745-21-09(L)	See c)(1) and d)(1) below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT	cility-wide VOC and HAP emission limitations, see Section B. above.
d.	40 CFR Part 60 Subpart K	e requirements of this rule are equivalent to the requirements of OAC rule 3745-21-09(L).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate and maintain 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; and

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 employ the use of a submerged fill pipe for loading the storage tank.

d) Monitoring and/or Recordkeeping Requirements

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

a. the types and amounts, in gallons, 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.

(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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

(2) The permittee shall include in the annual PER 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.

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

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) T009 was installed in 1975.

4. Emissions Unit Group - Storage Tanks: T001, T003, T004, T005, T006, T008, T010, T011, T043

EU ID	Operations, Property and/or Equipment Description
T001	1,901,928 gallons above ground internal floating roof tank #1.
T003	513,030 gallons above ground internal floating roof tank #4.
T004	825,499 gallons above ground internal floating roof tank #36.
T005	1,201,105 gallons above ground internal floating roof tank #52.
T006	813604 gallons above ground internal floating roof tank #57.
T008	1050000 gallons above ground internal floating roof tank #62.
T010	996660 gallons above ground Internal Floating Roof Storage Tank #63.
T011	996660 gallons above ground Internal Floating Roof Storage Tank #64.
T043	1,458,040 gallon above ground internal floating roof tank #61.

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

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

a. None.

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

a. b)(1)b.

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) and d)(1) below.
b.	a) OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT	Facility-wide VOC and HAP emission limitations, see Section B. above.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate and maintain 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; and

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:

a. the types and amount, in gallon, 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.

(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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

(2) The permittee shall include in the annual PER 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.

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

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) T001, T003-T006, T008, T010, T011 and T043 were installed before 1974.