Ohio Environmental Protection Agency

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

5/18/2016

Certified Mail

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

Ms. Kim Trostel
Buckeye Terminals LLC - Toledo West Terminal
940 Buckeye Rd
Lima, OH 45804

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010067
Permit Number: P0120783
Permit Type: OAC Chapter 3745-31 Modification
County: Lucas

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 Toledo Department of Environmental Services at (419)936-3015 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: TDES

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Toledo West Terminal

Facility ID:	0448010067
Permit Number:	P0120783
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/18/2016
Effective:	5/18/2016
Expiration:	9/25/2018

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Toledo West Terminal

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Authorization

Facility ID:	0448010067
Application Number(s):	A0055988, A0056016
Permit Number:	P0120783
Permit Description:	Chapter 31 modification to add the flexibility to operate a backup portable vapor combustion unit for the loading racks.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$400.00
Issue Date:	5/18/2016
Effective Date:	5/18/2016
Expiration Date:	9/25/2018

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

This document constitutes issuance to:

Buckeye Terminals LLC - Toledo West Terminal
2450 HILL AVENUE
TOLEDO, OH 43607

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0120783
Permit Description: Chapter 31 modification to add the flexibility to operate a backup portable vapor combustion unit for the loading racks.

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

Group Name: Loading Racks

Emissions Unit ID:	**J001**
Company Equipment ID:	Loading rack #1
Superseded Permit Number:	P0117319
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**J002**
Company Equipment ID:	Loading rack #2
Superseded Permit Number:	P0117319
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) None.

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 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.

3. Hazardous air pollution (HAP) emissions from this facility shall be less than 10 tons per year of any individual HAP and less than 25 tons per year for any combination of HAP, each as a rolling, 12-month summation of the monthly emissions. The facility-wide PTE has been determined by the permittee to be less than 10 tons per year of any individual HAP and less than 25 tons per year for any combination of HAP taking into consideration the throughput restriction made enforceable in Section C.1. for the emissions group J001 & J002. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirement to ensure compliance with these emissions limitations.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group –Loading Racks: J001, J002

EU ID	Operations, Property and/or Equipment Description
J001	Five (5) bay loading rack equipped with 12 loading arms and activated carbon VRU with bladder tank to store excess emissions for VRU or a back-up portable vapor combustion unit (VCU)
J002	Two (2) bay loading rack equipped with 4 loading arms and activated carbon VRU with bladder tank to store excess emissions for VRU or a back-up portable vapor combustion unit (VCU)

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

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

a. b)(1)f., b)(2)h., f)(1)d.

(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., b)(1)c., b)(2)b., c)(1), d)(1), e)(2)a. through e)(2)c., f)(1)a., f)(1)b., f)(1)c., and f)(2).

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
J001 – Loading rack #1		
a.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT)	The mass emissions of VOC from the vapor control system shall not exceed 0.019 pound of VOC per 1,000 gallons of distillate loaded into the delivery vessel. The combined VOC emissions from J001 and J002 shall not exceed 59.8 tons per rolling, 12-month period. The mass emissions of VOC from the vapor control system shall not exceed 0.38 pound of VOC per 1,000 gallons of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		gasoline loaded into the delivery vessel. See b)(2)a. and b)(2)b.
J002 – Loading Rack #2		
b.	OAC rule 3745-31-05(A)(3)	The mass emissions of VOC from the vapor control system shall not exceed 0.019 pound of VOC per 1,000 gallons of distillate loaded into the delivery vessel. See b)(2)a. through b)(2)c.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT)	The combined VOC emissions from J001 and J002 shall not exceed 59.8 tons per rolling, 12-month period. The mass emissions of VOC from the vapor control system shall not exceed 0.38 pound of VOC per 1,000 gallons of gasoline loaded into the delivery vessel.
J001 and J002		
d.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 22.34 tons per rolling, 12-month period. See b)(2)d. and b)(2)e.
e.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NO_x) emissions shall not exceed 0.745 ton per month averaged over a twelve-month rolling period. Particulate matter with an aerodynamic diameter of less than or equal to 10 microns in diameter (PM_{10}) shall not exceed 0.045 ton per month averaged over a twelve-month rolling period. Sulfur dioxide (SO_2) emissions shall not exceed 0.025 ton per month averaged over a twelve-month rolling period. See b)(2)d. through b)(2)g.
f.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, PM_{10}, and SO_2 emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)h.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-21-09(Q)	See b)(2)i. and c)(3) through c)(8)
h.	40 CFR Part 63, Subpart R	Exempt
i.	40 CFR Part 60, Subpart XX	Exempt

(2) Additional Terms and Conditions

a. Each continuous VOC monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9. At least 45 days before commencing certification testing of the continuous VOC monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of VOC emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous VOC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

b. 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.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q).

d. All gasoline and distillate loading shall be controlled by a vapor recovery unit (VRU) or other such device (portable vapor combustion unit (VCU)) capable of achieving the allowable emissions limitations required by this permit when the VRU is undergoing routine or emergency maintenance.

e. The permittee shall comply with the emissions limitations for CO, NO_x, particulate matter less than 10 microns in diameter (PM_{10}), and SO_2 only when using the backup portable VCU as a means of controlling VOC emissions from this emissions unit. All filterable and condensable particulate matter shall be considered PM_{10} for purposes of demonstrating compliance with these emissions limitations.

f. The CO, NO_x, PM_{10}, and SO_2 emissions limits were established to reflect the potentials to emit for this emissions unit taking into consideration the throughput limitations established under OAC rule 3745-31-05(D). Therefore, the monitoring, recordkeeping, and reporting requirements for the throughput

limitations as established in the following terms and conditions are sufficient to ensure compliance with these limitations.

g. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

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

i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The combined annual throughput for J001 and J002 shall not exceed 300,000,000 gallons of gasoline and 300,000,000 gallons of distillates (i.e. jet fuel, kerosene, diesel fuel, heating oil, and fuel oil), as a rolling, 12-month summation.

(2) When emissions are vented to the vapor combusting unit (VCU) for control, the pilot flame of the vapor combustion unit (VCU) shall be maintained at all times during the loading of gasoline (including gasoline and gasoline additives) or distillates (i.e. diesel or diesel additives).

(3) The vapor recovery system shall be kept in good working order and shall be used at all times during the transfer of gasoline or distillates (i.e. jet fuel, kerosene, diesel fuel, heating oil, or fuel oil) into gasoline tank trucks (as defined by 40 CFR 60.501). Transfer of gasoline or distillate into gasoline tank trucks without vapor controls is prohibited. Approval to load without vapor controls during malfunction or scheduled maintenance of controls is prohibited. Approval to load without vapor controls during malfunction or scheduled maintenance of the vapor recovery system will require prior approval of the Ohio EPA in accordance with OAC rule 3745-15-06, "Malfunction of Equipment; Scheduled Maintenance; Reporting".

(4) 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.

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

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

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.

(6) 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.

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

(8) 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.

(9) The permittee shall repair any leak from the vapor collection system or vapor control system within fifteen 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 one hundred 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 maintain monthly records for J001 and J002 of the following information:

a. the total, individual throughputs of gasoline and distillates, in gallons; and

b. the rolling, 12-month summations of the total individual throughputs of gasoline and distillates, in gallons, calculated by adding current month's throughputs at this facility to the throughputs for the preceding eleven calendar months from all throughputs at this facility.

These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director, or any authorized representative of the Director for review during normal business hours.

(2) When emissions are vented to the vapor combusting unit (VCU) for control, 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 shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. Each manned business day, the operator shall verify that the pilot flame and flame sensor are working during loading operations. The permittee shall operate and maintain the fail-safe system that immediately shuts down loading if the pilot flame does not ignite.

(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 OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

(4) The permittee shall perform monthly monitoring of 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. The monthly monitoring shall be conducted approximately every 30 days. 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.

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

(5) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using 40 CFR Part 60, Appendix A, Method 21 procedure for open-ended lines. Measurements will be recorded during the processing of vapors during the last 5 minutes of the adsorption cycle for each vessel. The exhaust gas VOC concentration shall not exceed 4% (as propane). VOC readings in excess of the compliant value will require the permittee to take corrective action to prevent similar exceedances from occurring in the future.

(6) The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery units. These records and all supporting data shall be maintained in the company's files for a period of not less than five years and shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

Once a VOC CEMS is installed, certified and operating in accordance with the quality assurance/quality control plan specified in b)(2)a., the permittee shall not be required to monitor the VOC exhaust gas concentration on a monthly basis because VOC emissions shall be monitored and recorded on a continuous basis.

The permittee may choose to revert back to monthly monitoring by Method 21 in lieu of monitoring by the VOC CEMS. If the permittee chooses to do so, it shall be noted in the next quarterly report.

(7) Prior to the installation of the continuous volatile organic compound (VOC) monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous VOC monitoring system meets the requirements of Performance Specifications 8 or 9. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee also shall submit documentation supporting the proposed VOC detection method (flame ionization (FI), photoionization (PI), nondispersive infrared absorption (NDIR), gas chromatography (GC), or other detection principle) that is appropriate for the VOC species present in the emission gases and that meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 6 and 8 or 9.

(8) If the permittee chooses to continuously monitor VOC emissions in lieu of monthly monitoring, the permittee shall install, operate, and maintain equipment to continuously monitor and record VOCs from this emissions unit in units of the applicable standard(s). 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 parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

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

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;

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

h. 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,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

e) Reporting Requirements

(1) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (Toledo Environmental Services) 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. any exceedance of the rolling, 12-month throughput limitations for gasoline and distillates;

b. the actual rolling, 12-month throughput levels for gasoline and distillates, in gallons, for J001 and J002;

c. all exceedances of the 0.38 pound of VOC per 1,000 gallons loaded from the vapor control system;

d. all periods of time during which the emissions were vented to the vapor combusting unit (VCU) for control, and 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 and an explanation of any corrective action taken to prevent similar occurrences; and

e. any exceedance of the exhaust gas vapor concentration from the carbon adsorption vessels; and

f. all deviations (excursions) of the operational restrictions c)(2) through c)(8) about vapor recovery system, loading racks, gasoline loading lines and vapor lines, spill discard into sewer open containers and leak from vapor collection system.

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 Director (the appropriate District Office or local air agency).

(3) 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 appropriate Ohio EPA District Office or local air agency, 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. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliant results following any corrective actions;

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

xii. 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

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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 of whether there is an exceedance of any applicable limit

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(5) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

0.38 lb VOC per thousand gallons of gasoline loaded

Applicable Compliance Method:

When choosing to use a continuous VOC monitoring system to demonstrate compliance, the compliance shall be demonstrated based on the continuous emissions monitor (CEM) and the certification tests of the continuous VOC monitoring system required in f)(3).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with the methods and procedures specified in OAC rule 3745-21-10(E). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA. The most recent stack test which demonstrated compliance with the allowable emissions limitation (0.027 pound VOC per 1000 gallons of gasoline based on stack testing performed November 25, 2014)

b. Emission Limitation:

0.019 lb VOC per thousand gallons of distillate loaded

Applicable Compliance Method:

Compliance may be determined based on the uncontrolled emission factor specified in USEPA reference document AP-42 (0.016 pound VOC per 1000 gallons of jet kerosene), Fifth Edition, Compilation of Air Pollution Emission Factors, Table 5.2-5 dated 6/08.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A, as appropriate, using the methods and procedures specified in OAC rule 3745-21-10. The results of the stack testing shall be reported as pounds of VOC per hour as propane. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

The combined total VOC emissions from J001 and J002 shall not exceed 59.8 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable VOC emission rates for gasoline and distillate (0.38 and 0.019 lb VOC /1000 gallons, respectively) by the maximum annual throughput (300,000,000 gallons gasoline and 300,000,000 gallons of distillates) summing the results, and dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the allowable VOC emissions rates and the throughput restrictions, compliance shall also be shown with the annual emission limitation.

d. <u>Emission Limitation:</u>

CO emissions shall not exceed 22.34 tons per rolling, 12-month period.

NO_x emissions shall not exceed 0.745 ton per month averaged over a twelve-month rolling period.

PM_{10} emissions shall not exceed 0.045 ton per month averaged over a twelve-month rolling period.

SO_2 emissions shall not exceed 0.025 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

These limits were established by multiplying the throughput limitations established under OAC rule 3745-31-05(D) multiplied by 5 lb vapor/1,000 gallons loaded multiplied by the emissions factors for each pollutant found in AP-42, Section 1.3, Table 1.3-1, or the emissions factors provided by the manufacturer, whichever was higher. Compliance shall be assumed provided the permittee demonstrates compliance with the throughput limitations established under OAC rule 3745-31-05(D).

(2) The permittee shall conduct, or have conducted, emission testing for J001 and J002 in accordance with the following requirements:

a. The emission testing shall be conducted no later than five (5) years from the most recent stack test. This test shall be performed between the months of May and July. This most recent stack test on the VRU was performed November 25, 2014.

b. The testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC for gasoline loading (0.38 lb/1000 gallons).

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: methods and procedures specified in OAC rule 3745-21-10(E)

d. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limit and/or control requirements, although there may be circumstances where a lower emissions loading is deemed the most challenging scenario, but no less than 80,000 gallons of gasoline loaded, unless otherwise specified or approved by the Toledo Division of Environmental Services.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services refusing to accept the results of the emission test(s).

g. Personnel from the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services within 30 days following the completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

(3) If the permittee chooses to continuously monitor VOC emissions by CEMS, then the permittee shall conduct certification tests of the continuous VOC monitoring system pursuant to 40 CFR Part 60, Appendix B, Performance Specification 6 and Performance Specification 8 or 9 (as appropriate); ORC section 3704.03(I); and using the detection method that is appropriate for the VOC species present in the emission gases.

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous VOC monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 6 and 8 or 9; and ORC section 3704.03(I).

If the permittee chooses to continuously monitor VOC emissions by CEMS, 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.

g) Miscellaneous Requirements

(1) None.