



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

5/18/2016

Lisa Fishbeck
 Sunoco Partners Marketing & Terminals LP Columbus East
 29120 Wick Rd
 Romulus, MI 48174

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040227
 Permit Number: P0120300
 Permit Type: Renewal
 County: Franklin

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 Ohio EPA DAPC, Central District Office at (614)728-3778 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: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

Sunoco Partners Marketing & Terminals LP Columbus East

Facility ID:	0125040227
Permit Number:	P0120300
Permit Type:	Renewal
Issued:	5/18/2016
Effective:	5/18/2016
Expiration:	5/18/2021



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

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Authorization

Facility ID: 0125040227
Application Number(s): A0055275
Permit Number: P0120300
Permit Description: Renewal FEPTIO permit for loading rack, four (4) non-NSPS Kb storage tanks and two (2) NSPS Kb storage tanks
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/18/2016
Effective Date: 5/18/2016
Expiration Date: 5/18/2021
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Sunoco Partners Marketing & Terminals LP Columbus East
3499 West Broad Street
Columbus, OH 43204

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

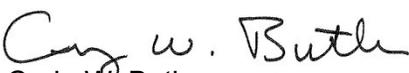
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0120300

Permit Description: Renewal FEPTIO permit for loading rack, four (4) non-NSPS Kb storage tanks and two (2) NSPS Kb storage tanks

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
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable

Group Name: Kb Storage Tanks

Emissions Unit ID:	T001
Company Equipment ID:	Storage Tank #9
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Storage Tank #11
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable

Group Name: Non-Kb Storage Tanks

Emissions Unit ID:	T002
Company Equipment ID:	Storage Tank #10
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Storage Tank #12
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Storage Tank #13
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T006
Company Equipment ID:	Storage Tank #14
Superseded Permit Number:	P0082679
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP Columbus East
Permit Number: P0120300
Facility ID: 0125040227
Effective Date: 5/18/2016

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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) **Applicable Emission Limitations and/or Control Requirements**
 - (1) This permit establishes the following federally enforceable limitations on emission of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Title V permitting requirements:
 - a. The actual emissions from emission units J001, T001, T003, T002, T004, T005, T006 and all other emission sources at the facility, including by not limited to any de minimis emission units (as defined in OAC rule 3745-15-05), any registration status, insignificant status and/or exempt/permit-by-rule (PBR) emission units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons of any single/individual HAP (IHAP), based upon a rolling, 12-month summation.
 - b. The actual emissions from emission units J001, T001, T003, T002, T004, T005, T006 and all other emission sources at the facility, including by not limited to any de minimis emission units (as defined in OAC rule 3745-15-05), any registration status, insignificant status and/or exempt/permit-by-rule (PBR) emission units pursuant to OAC rule 3745-31-03, combined, shall not exceed 24.9 tons for any combination of HAPs (TCHAP), based upon a rolling, 12-month summation.
 - b) **Monitoring and Record Keeping**
 - (1) The permittee shall maintain the following information on a monthly basis;
 - a. the type and quantity (in gallons) of material (gasoline, ethanol, distillate) loaded/unloaded;
 - b. the individual HAP (IHAP) content for each material loaded/unloaded, in pounds per pound of VOC;
 - c. the combined HAP (TCHAP) content for each material loaded/unloaded, in pounds per pound of VOC;
 - d. specific HAP compound emission rates contained in B.1.d)(1);
 - e. the total emissions of each individual HAP (IHAP) from any de minimis emission unit as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emission unit pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with B.1.d)(1);
 - f. the total emissions of combined HAPs (TCHAP) from any de minimis emission unit as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emission unit pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with B.1.d)(1);
 - g. the total emissions of each IHAP from emission units J001, T001, T003, T002, T004, T005, and T006, in tons, calculated in accordance with B.1.d)(1);



- h. the total emissions of TCHAP from emission units J001, T001, T003, T002, T004, T005, and T006, in tons, calculated in accordance with B.1.d)(1);
- i. the rolling, 12-month summation of IHAP from all emission units operating at the facility, in ton(s), i.e. the summation of all IHAP emissions for the present month plus the previous 11 months of operation; and
- j. the rolling, 12-month summation of TCHAP from all emission units operating at the facility, in ton(s), i.e. the summation of all TCHAP emissions for the present month plus the previous 11 months of operation.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Central District Office.

- (2) These emission units (J001, T001, T003, T002, T004, T005, and T006) have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material usage, upon issuance of this permit.

c) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit 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.
- (3) The permittee shall submit quarterly deviation (excursion) reports 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. any exceedance of the rolling, 12-month individual HAP emission limitation; and
- ii. any exceedance of the rolling, 12-month combined HAPs emission limitation.

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 (Central District Office).

d) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in B.1.a)(1) above shall be determined in accordance with the following methods:

- a. Emissions Limitations:

Emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period

Emissions of total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period

Applicable Compliance Method:

- i. For any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, the permittee shall calculate HAP emissions consistent with the information presented in the installation and/or operating permit application using U.S. EPA approved emissions factors or emissions factors otherwise approved by Ohio EPA, Central District Office.
- ii. For emission unit J001, IHAP and TCHAP emissions from the VCU and fugitive emissions for gasoline loading are calculated by multiplying the following HAP emission factors by the VOC emissions [from Gasoline Distribution Industry (Stage 1)-Background Information for Proposed Standards, EPA-453/R-94-002a, January 1994, Table 3-2]:

Benzene – 0.009 pound per pound of VOC emissions;
Ethyl Benzene-0.001 pound per pound of VOC emissions;
Hexane-0.016 pound per pound of VOC emissions;
Toluene-0.013 pound per pound of VOC emissions;
Xylene-0.005 pound per pound of VOC emissions;
2, 2, 4 trimethylpentane-0.008 pound per pound of VOC emissions; and



TCHAP-0.052 pound per pound of VOC emissions

- iii. For gasoline storage tanks, IHAP and TCHAP emissions are calculated by multiplying the VOC emissions (tons/month) from all gasoline storage tanks at the facility, as determined using US EPA's "TANKS" program, version 4.09D or newer, by the HAP emission factor specified in B.1.d)(1)ii.
- iv. For ethanol storage tanks, IHAP and TCHAP emissions are calculated by multiplying the VOC emissions (tons/month) from all ethanol storage tanks at the facility, as determined using US EPA's "TANKS" Program, version 4.09D, or newer, by the HAP emission factor specified in B.1.d)(1)ii., and then by (0.02/0.52) [From Archer Daniels Midland communication to Ohio EPA, Central District Office, September 24, 2004].
- v. For all emission units at the facility, IHAP and TCHAP emissions from equipment leaks (fugitives from valves, flanges, open lines, pumps, etc.) are calculated by multiplying the VOC emissions (tons/month) from equipment leak as determined using "Protocol for Equipment Leak Emission Estimates" (EPA 453/R-95-017) by the HAP emission factor specified in B.1.d)(1)ii for gasoline or B.1.d)(1)vi. for distillate fuel.
- vi. For emission unit J001, IHAP and TCHAP emissions from distillate fuel loading are calculated by multiplying the following HAP emission factors by the VOC emission factors derived from the "speciation option" of US EPA's "TANKS" Program:
 - Benzene-0.0022 pound per pound of VOC emissions;
 - Ethyl Benzene-0.0031 pound per pound of VOC emissions;
 - Hexane-0.00046 pound per pound of VOC emissions;
 - Toluene-0.0239 pound per pound of VOC emissions;
 - Xylene-0.0573 pound per pound of VOC emissions; and
 - 1, 2, 4 trimethylbenzene-0.0427 pound per pound of VOC emissions

e) **Miscellaneous Requirements**

- (1) 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 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>.



Final Permit-to-Install and Operate
Sunoco Partners Marketing & Terminals LP Columbus East
Permit Number: P0120300
Facility ID: 0125040227
Effective Date: 5/18/2016

C. Emissions Unit Terms and Conditions



1. J001, Truck Loading

Operations, Property and/or Equipment Description:

Truck Loading Rack

- 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., b)(2)a., b)(2)b., b)(2)d., d)(3), e)(1), f)(1)
- 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) (Synthetic minor to avoid TV)	<p><u>Gasoline Loading Emission Limitation:</u> 0.27 pound of volatile organic compounds (VOC) per 1,000 gallons [32 milligram per liter (mg/l)] of gasoline loaded out</p> <p><u>Distillate Loading Emission Limitation:</u> 0.016 pound of VOC per 1,000 gallons (1.9 mg/l) of distillates loaded out</p> <p><u>Emissions Shall Not Exceed:</u> 75.69 tons of VOC from all load out, including fugitives, per rolling, 12-month period See b)(2)a., b)(2)b., b)(2)c., b)(2)d.</p>
b.	OAC rule 3745-21-09(Q)	<p>The VOC emission limitation specified by this rule is less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31-05(D)</p> <p>See c)(1) – c)(7), d)(1), d)(2), e)(2)</p>

(2) Additional Terms and Conditions

- a. The maximum annual throughput for this emission unit shall not exceed 200,000,000 gallons of gasoline based upon a rolling, 12-month period. This limit includes a maximum of 20,000,000 gallons of ethanol per rolling, 12-month period.
- b. The maximum annual throughput for this emission unit shall not exceed 180,000,000 gallon of distillate per rolling, 12-month period.
- c. The term "gasoline" refers to gasoline, fuel ethanol, additives and transmix. The term "distillate" refers to diesel and kerosene.
- d. All gasoline and distillate loading shall be controlled by a vapor collection/control system.

c) Operational Restrictions

- (1) The loading rack shall be equipped with a vapor collection system to ensure that during loading:
 - 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 -6 and 18 inches of water.
- (2) The loading rack shall be equipped with a vapor control system to ensure that:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system; and
 - b. any gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
- (3) The loading rack shall be provided with a means to prevent fuel drainage from the loading device when not in use or to achieve complete drainage before the loading device is disconnected.
- (4) All fuel loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (5) The permittee shall not permit fuel to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
- (6) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of OAC rule 3745-21-09(Q)(1) and when such leak is equal to or greater than 100 percent of the lower explosive limit (LEL) as propane, as determined under OAC rule 3745-21-10(K).

- (7) The pilot flame in the flare's pilot light shall be maintained at all times during the loading of gasoline and distillates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly install, operate and maintain equipment to monitor the pressure in the vapor collection system to demonstrate compliance with the pressure range established pursuant to OAC rule 3745-21-09(Q). The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- (2) The permittee shall repair any leak from the vapor collection system/vapor control system, that is equal to or greater than 100 percent of the LEL as propane, as determined under OAC rule 3745-21-10(K), within 15 days of detection. The permittee shall maintain a record of all leaks not repaired within 15 days of detection.
- (3) The permittee shall maintain the following records:
- a. the monthly load out of gasoline, in gallons;
 - b. the monthly load out of distillates, in gallons;
 - c. the monthly VOC emissions, in tons;
 - d. the rolling, 12-month summation of gasoline load out, in gallons;
 - e. the rolling, 12-month summation of distillate load out, in gallons; and
 - f. the rolling, 12-month VOC emission rate, in tons.
- (4) The permittee shall maintain the following daily records:
- a. daily pilot inspection documentation;
 - b. description of any/all failures of the flame detection system;
 - c. if/when a failure is detected, record the period of time when gasoline/distillates were loaded out until the system is/was repaired; and
 - d. a log of operating times for the vapor collection/control systems, control device, monitoring equipment and loading rack.
- (5) The permittee shall properly install, operate, and maintain a heat-sensing device (uv or thermocouple) to indicate the presence or absence of a flame when the emission 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 business day, the operator shall verify that the pilot flame and sensor are working during load out operations.
- (6) The permittee shall maintain the vapor collection/vapor control system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).



- (7) The permittee shall implement a preventative maintenance program (PMP) for the vapor control unit. The PMP shall include an annual inspection of the vapor control unit by a qualified individual. The PMP and resultant reports shall be made available to Ohio EPA Central District Office upon request.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports 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. all exceedances of the rolling, 12-month gasoline loading limitation;
 - ii. all exceedances of the rolling, 12-month distillate loading limitation;
 - iii. all exceedances of the rolling, 12-month VOC emission limitation;
 - iv. all periods during which the flare's pilot flame was not functioning properly; and
 - v. all periods during which the loading rack was in operation and the displaced vapors were not vented to the collection/control system.
- (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 Director (Ohio EPA, Central District Office) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

f) Testing Requirements

- (1) 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: 0.27 pound VOC per 1,000 gallons of gasoline loaded

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission tests required pursuant to Section f)(1)h. below. The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E) and specify a minimum of one 6-hour test during which at least 217,980 gallons (825,144 liters) of gasoline are loaded. (The test should be conducted at the maximum gasoline throughput possible.)
 - b. Emission Limitation: 0.16 pound VOC per 1,000 gallons of distillates loaded

Applicable Compliance Method: Compliance with this emission limitation shall be based upon emission factors from AP-42, 5th Edition, Table 5.2-5 (June 2008) of 0.016 pound of VOC per 1,000 gallons of kerosene and 0.014 pound VOC per 1,000 gallons of diesel loaded out.

- c. Emission Limitation: 75.69 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance with this emission limitation shall be determined based upon the record keeping established in d)(3), above, and a summation of the emissions from the VCU, gasoline load out emissions, fugitive emissions, and distillate fuel loading emissions as follows:

- i. For the VCU, sum current monthly material throughputs with the previous 11 months and multiply this sum by the results of the most recent emission test that demonstrated compliance with applicable emission limitation for the VCU (pounds VOC per 1,000 gallons gasoline loaded) and divide by 2,000 lbs/ton;
 - ii. For gasoline loading fugitive emissions, sum the monthly gasoline throughput for the current month with the previous 11 months and multiply by the emission factor (pounds VOC per 1,000 gallons gasoline loaded) obtained using Equation 1 of AP-42, Section 5.2 (June 2008) multiplied by the overall reduction efficiency and divide this result by 2,000 lbs/ton;
 - iii. For distillate fuel loading emissions, sum the current monthly distillate throughput with the previous 11 month and multiply this sum by the AP-42, Table 5.2-5 (June 2008) emission factor (pounds of VOC per 1,000 gallons distillate loaded) and divide by 2,000 lbs/ton;
 - iv. VOC fugitive emissions from J001 shall be determined using EPA-453/R-95-017), "Protocol for Equipment Leak Emission Estimates".
- d. The permittee shall conduct, or have conducted, emission testing for this emission unit in accordance with the following requirements:
- i. The emission testing for the VOC emission rate shall be conducted approximately 2.5 years after issuance of this permit;
 - ii. The emission testing shall be conducted to demonstrate compliance with the VOC emission rates contained in b)(1)a.;
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

Method 25B of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - iv. 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 VOC emission limitation, unless otherwise specified or approved by Ohio EPA Central District Office.

Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emission loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission 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 Ohio EPA Central District Office's refusal to accept the results of the emission test(s).
- vi. Personnel from Ohio EPA Central District Office 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 emission unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Central District Office.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -Kb Storage Tanks: T001,T003,

EU ID	Operations, Property and/or Equipment Description
T001	Above Ground Internal Floating Roof Storage Tank #9 with 398,291 gallons capacity
T003	Above Ground Internal Floating Roof Storage Tank #11 with 795,563 gallon capacity

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: <u>T001 (Tank #9)</u> 3.54 tons VOC per year <u>T003 (Tank #11)</u> 4.28 tons VOC per year See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2), and e)(1)
d.	40 CFR Part 60, Subpart Kb	See b)(2)c., c)(2), d)(3), e)(2), f)(2), g)(1)



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from T001 and T003 because the uncontrolled potential to emit for VOC is less than 10 tons per year.

c.	60.112b	Standard for VOC
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c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

(2)	60.114b	Alternative emission limitations
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d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and



- b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the director or their representative upon verbal or written request.

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

(3)	60.116b	Monitoring
	60.115b	Reporting and recordkeeping

e) Reporting Requirements

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

(2)	60.115b	Reporting and recordkeeping
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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 for T001: 3.54 tons VOC per year

- Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or newer.

- b. Emission Limitation for T003: 4.28 tons VOC per year

- Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or.

(2)	60.113b	Testing
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g) Miscellaneous Requirements

(1)	60.117b	Delegation
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3. Emissions Unit Group -Non-Kb Storage Tanks: T002,T004,T005,T006,

EU ID	Operations, Property and/or Equipment Description
T002	Above Ground Internal Floating Roof Storage Tank #10 with 399,139 gallon capacity
T004	Above Ground Internal Floating Roof Storage Tank #12 with 816,228 gallon capacity
T005	Above Ground Internal Floating Roof Storage Tank #13 with 414,044 gallon capacity
T006	Above Ground Internal Floating Roof Storage Tank #14 with 836,758 gallon capacity

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: <u>T002 (Tank #10)</u> 3.54 tons VOC per year <u>T004 (Tank #12)</u> 2.10 tons VOC per year <u>T005 (Tank #13)</u> 2.54 tons VOC per year <u>T006 (Tank #14)</u> 3.40 tons VOC per year See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2) and e)(1)

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from T002, T004, T005 and T006 because the uncontrolled potential to emit for VOC is less than 10 tons per year.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the director or their representative upon verbal or written request.

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

e) Reporting Requirements

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation for T002: 3.54 tons VOC per year
Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or newer.
 - b. Emission Limitation for T004: 2.10 tons VOC per year
Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or newer.
 - c. Emission Limitation for T005: 2.54 tons VOC per year
Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or newer.
 - d. Emission Limitation for T006: 3.40 tons VOC per year
Applicable Compliance Method: VOC emission from the storage tanks shall be determined using the U.S. EPA's "TANKS" Program, version 4.09D or newer.



- g) Miscellaneous Requirements
 - (1) None.