State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
SUMMIT COUNTY

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02104

DATE: 4/10/2001

CITGO Petroleum Corp Tallmadge Terminal
Carl P Venzke
6433 Cosgray Rd
Dublin, OH 43016-8737

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: **USEPA** **ARAQMD**

FINAL PERMIT TO INSTALL 16-02104

Application Number:	16-02104
APS Premise Number:	1677120030
Permit Fee:	**$1000**
Name of Facility:	CITGO Petroleum Corp Tallmadge Terminal
Person to Contact:	Carl P Venzke
Address:	6433 Cosgray Rd Dublin, OH 43016-8737

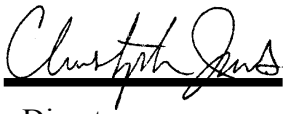
Location of proposed air contaminant source(s) [emissions unit(s)]:
1595 Southeast Ave
Tallmadge, **Ohio**

Description of proposed emissions unit(s):
Modification to Loading Rack J001, Four (4)Additional Loading Arms - Supercedes PTI 16-1771, issued 5/6/98.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	95.0 for entire facility
total combined HAPs	24.0 for entire facility
individual HAP	9.0 for entire facility

Emissions Unit ID: **J001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
J001 - petroleum loading rack with three bays, fourteen loading arms, and a vapor recovery unit (the terms in this permit supercede the terms in PTI 16-1771 issued on May 6, 1998).	OAC rule 3745-31-05(A)(3)
	40 CFR Part 60, subpart XX
	OAC rule 3745-21-09(Q)
	OAC rule 3745-35-07

Applicable Emissions Limitations/Control Measures
68.35 pounds of total organic compounds (TOC) per hour from the vapor collection system
The requirements of this rule also include compliance with the requirements of OAC rule 21-09(Q), OAC rule 3745-35-07, and 40 CFR Part 60, subpart XX.
The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to 40 CFR Part 60, subpart XX. See A.2.a through A.2.d below.
Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95.0 tons of volatile organic compounds (VOC); 24.0 tons of total combined hazardous air pollutants (HAPs); and 9.0 tons of any individual HAP.
The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 mg of TOC per liter of gasoline loaded.

2. Additional Terms and Conditions

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

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

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

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

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

ii. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

2.c A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

2.d All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

B. Operational Restrictions

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

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

3. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

4. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

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

b. the permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded;

c. the permittee shall cross-check each tank identification number, obtained in accordance with section B.4.b of this permit, with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained;

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

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

if either the quarterly or semiannual cross-check provided in section B.4.c.i or B.4.c.ii of this permit reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met;

d. the terminal owner or operator shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded within 1 week of the document cross-check in section B.4.c of this permit;

e. the permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be re-loaded until vapor tightness documentation for that tank is obtained; and

f. alternate procedures to those described in sections B.4.a through B.4.e of this permit for limiting gasoline tank truck loadings may be used upon application to, and approval by, Akron Regional Air Quality Management District (Akron RAQMD).

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

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

7. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 Pascal (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in section 60.503(d) of 40 CFR Part 60.

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

9. The following vapor recovery unit (VRU) parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:

   a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;

   b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;

   c. to ensure a proper flow of gasoline to the absorber nozzle when the vapor recovery unit is operating, a differential pressure of 59 inches of water column shall be maintained across the orifice plate, located in the gasoline supply line to the absorber tower nozzle; and

   d. to ensure proper adsorption, the carbon bed temperatures, at all levels, shall not exceed 150 degrees F.

   Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

10. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface) and distillates (i.e., kerosene and diesel fuel). The annual throughputs of gasoline and distillates shall not exceed 491,503,051 gallons and 349,456,948 gallons, respectively, based upon rolling, 12-month summations of the throughputs.

C. Monitoring and/or Recordkeeping Requirements

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

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

b. the rolling, 12-month summations of the total individual throughputs of gasoline and distillates, in gallons; and

c. the calculated, total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates for all emissions units at the facility, in tons.

2. The permittee shall have implemented a preventive maintenance program (PMP) for the McGill VRU which has been submitted to the Akron RAQMD. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspection by the Akron RAQMD.

3. The permittee shall maintain the data required by the "McGill Daily Operating Check Sheet" on a daily basis (i.e., Monday through Friday). The permittee shall submit any subsequent changes to this check sheet to Akron RAQMD within 30 days prior to implementing these changes. The changes to this check sheet shall be mutually agreeable to CITGO Petroleum Corporation and Akron RAQMD.

4. The permittee shall collect and record the following information for each day:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. during the regeneration cycle, the vacuum pressure in inches of Hg;

c. the gasoline supply temperature in degrees F;

d. the differential pressure across the orifice plate in inches of water column;

e. the carbon bed temperatures in degrees F; and

f. the pressure in the vapor collection system, in inches of water gauge pressure.

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

6. The tank truck vapor tightness documentation required under section B.4.a of this permit shall be kept on file at the terminal in a permanent form available for inspection.

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

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

   b. tank owner and address;

   c. tank identification number;

   d. testing location;

   e. date of test;

   f. tester name and signature;

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

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

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

   a. date of inspection;

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

   c. leak determination method;

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

   e. inspector name and signature.

9. The permittee shall keep documentation of all notifications required under section B.4.d of this permit on file at the terminal for at least 2 years. The permittee shall also keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

10. The permit to install for this emissions unit (J001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

    Pollutant: gasoline vapor

    TLV (mg/m3): 890
    Maximum Hourly Emission Rate (lbs/hr): 22.78*
    Predicted 1 Hour Maximum Ground-Level
    Concentration at the Fence line (ug/m3): 15,780
    Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 21,190.5

    Pollutant: methyl tert-butyl ether (MTBE)

    TLV (mg/m3): 144
    Maximum Hourly Emission Rate (lbs/hr): 1.59*
    Predicted 1 Hour Maximum Ground-Level
    Concentration at the Fence line (ug/m3): 1100
    Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3428.6

    Pollutant: hexane

    TLV (mg/m3): 176
    Maximum Hourly Emission Rate (lbs/hr): 0.36*
    Predicted 1 Hour Maximum Ground-Level
    Concentration at the Fence line (ug/m3): 275
    Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4190.48

    Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.30*
Predicted 1 Hour Maximum Ground-Level
Concentration at the Fence line (ug/m3): 220
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476.19

*Increase in emission rate.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted,

change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel throughput limitations for gasoline and distillates.

5. The permittee shall submit deviation (excursion) reports which identify any parameter readings that are outside of the acceptable value for each VRU key operating parameter established in section B.9 above. The report shall include a written description of why the unacceptable reading occurred, and an explanation of any action taken or required to correct the unacceptable reading.

6. The permittee shall submit pressure deviation (excursion) reports that identify all periods of time during which the pressure in the vapor collection system did not comply with the allowable range of minus 6 to plus 18 inches of water gauge pressure specified in section A.2.a.ii above.

7. The permittee shall notify Akron RAQMD in writing of any monthly record indicating that a leak was not repaired within 15 days. The notification shall include a copy of such record and shall be sent to Akron RAQMD within 30 days after the leak was discovered.

8. The permittee shall submit annual reports which specify the following:

   a. VOC, total combined HAPs, and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

b. actual throughput levels of gasoline and distillates, in gallons, for J001.

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

E. Testing Requirements

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

   a. the emission testing shall be conducted within 12 months prior to permit to operate renewal during the summer months when the gasoline vapor pressure is highest;

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

   c. the following test methods and procedures of 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable mass emission rate for TOC:

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

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

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

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

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

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s).

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

   a. Emission Limitation

      35 mg of TOC per liter of gasoline loaded

      Applicable Compliance Method

      Compliance with the allowable mass emission rate for TOC shall be determined through emission testing as required in sections E.1 through E.4 of these terms and conditions.

   b. Emission Limitation

      68.35 pounds of TOC per hour from the vapor collection system

      Applicable Compliance Method

      Multiply the allowable emission rate of 35 mg of TOC per liter of gasoline loaded by the maximum liters of gasoline load per hour.

   c. Emission Limitation

      95 tons per year of VOC for the entire facility

      Applicable Compliance Method

      Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

      In order to calculate the VOC emission rates, the permittee shall comply with the following:

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

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.

d. Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

For Gasoline:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions

vii. 2,2,4-trimethylpentane - 0.008 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards" EPA-453/R-94-002a, dated January 1994.

For Distillates:

i. benzene - 0.22 pound of benzene emissions per pound of VOC emissions
ii. cumene - 0.004 pound of cumene emissions per pound of VOC emissions
iii. ethyl benzene - 0.02 pound of ethyl benzene emissions per pound of VOC emissions
iv. hexane - 0.18 pound of hexane emissions per pound of VOC emissions
v. toluene - 0.12 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.06 pound of xylene emissions per pound of VOC emissions

Emission factors are derived from using speciation option of USEPA's "Tanks" program.

e. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

F. Miscellaneous Requirements

1. The terms and conditions of this Permit to Install 16-02104 shall supersede all the air pollution control requirements for J001 in Permit to Install 16-1771, issued on May 6, 1998.

NEW SOURCE REVIEW FORM B

PTI Number: 16-02104 Facility ID: 1677120030

FACILITY NAME CITGO Petroleum Corp Tallmadge Terminal

FACILITY DESCRIPTION Modification to Loading Rack J001, Four (4)Additional Loading Arms - Supercedes PTI 16-1771, issued 5/6/98. CITY/TWP Tallmadge

SIC CODE 5171 SCC CODE 4-04-001-53 EMISSIONS UNIT ID J001

EMISSIONS UNIT DESCRIPTION petroleum loading rack with three bays, fourteen loading arms, and a vapor recovery unit (the terms in this permit supercede the terms in PTI 16-1771 issued on May 6, 1998).

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds			33.1	68.35 lbs/hr TOC	95.0 TPY VOC for the entire facility
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					24.0 TPY combined hazardous air pollutants (HAPs) for the entire facility 9.0 TPY of any individual HAP for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60, subpart XX NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
vapor collection system and vapor recovery unit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

NEW SOURCE REVIEW FORM B

PTI Number: 16-02104 Facility ID: 1677120030

FACILITY NAME CITGO Petroleum Corp Tallmadge Terminal

FACILITY DESCRIPTION Modification to Loading Rack J001, Four (4)Additional Loading Arms - Supercedes PTI 16-1771, issued 5/6/98. CITY/TWP Tallmadge

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: gasoline vapor, methyl tert-butyl ether, hexane, and toluene