



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

6/29/2016

Certified Mail

Elaine Moore
 Toledo Terminaling Company LLC
 1819 Woodville Rd
 Oregon, OH 43616

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0448020109
 Permit Number: P0120717
 Permit Type: Initial Installation
 County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

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

If you have any questions regarding your permit, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Toledo Terminating Company LLC**

Facility ID:	0448020109
Permit Number:	P0120717
Permit Type:	Initial Installation
Issued:	6/29/2016
Effective:	6/29/2016



Division of Air Pollution Control
Permit-to-Install
for
Toledo Terminating Company LLC

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Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date: 6/29/2016

Authorization

Facility ID: 0448020109
Facility Description:
Application Number(s): A0055856
Permit Number: P0120717
Permit Description: Loading Rack and Ethanol Tank Initial Installation PTI
Permit Type: Initial Installation
Permit Fee: \$600.00
Issue Date: 6/29/2016
Effective Date: 6/29/2016

This document constitutes issuance to:

Toledo Terminaling Company LLC
2200 Pickle Rd
Oregon, OH 43616

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

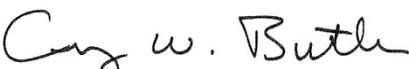
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 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


Craig W. Butler
Director



Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date:6/29/2016

Authorization (continued)

Permit Number: P0120717

Permit Description: Loading Rack and Ethanol Tank Initial Installation PTI

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

Emissions Unit ID:	J006
Company Equipment ID:	New truck loading rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T177
Company Equipment ID:	Ethanol IFRT
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date:6/29/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- 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 state-only required 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 Toledo Department of Environmental Services. 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, 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.)

10. 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) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date:6/29/2016

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. The following emissions units contained in this permit are subject to 40 CFR, Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984: T177. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.

[40 CFR, Part 60, Subpart Kb]

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals: J006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.

[40 CFR Part 60, Subpart XX]

4. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subparts A and R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations): J006. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.

[40 CFR, Part 63, Subpart R]

5. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subparts A and EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline): J006. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.

[40 CFR, Part 63, Subpart EEEE]



Final Permit-to-Install
Toledo Terminaling Company LLC
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C. Emissions Unit Terms and Conditions

1. J006, New truck loading rack

Operations, Property and/or Equipment Description:

Truck Loading Rack - 6 bay loading rack used to load gasoline, diesel, ethanol, and fuel additive into tank trucks, all controlled by a carbon adsorber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(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.

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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 5.1 tons per month average over a twelve-month rolling period.
<i>When loading gasoline:</i>		
b.	OAC rule 3745-21-09(Q)	See b)(2)a., b)(2)b. and c)(2) through c)(6).
c.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	See b)(2)c.
d.	40 CFR Part 60, Subpart XX (40 CFR 60.500 – 60.506) [In accordance with 60.500(a), this emissions unit is a loading rack at a bulk gasoline terminal which delivers liquid product into gasoline tank trucks for which construction commenced after December, 17 1980.]	In accordance with 40 CFR Part 63.420(g), each owner or operator of a bulk gasoline terminal subject to 40 CFR 63, Subpart R, that is also subject to the provisions of 40 CFR 60, Subpart XX, shall comply only with the provisions in each subpart that contain the most stringent control requirements for that facility. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart A (40 CFR 63.1-63.16)	Table 1 to 40 CFR Part 63, Subpart R specifies the provisions of subpart A of 40 CFR Part 63 that apply. See b)(2)e. through b)(2)j.
f.	40 CFR Part 63, Subpart R (40 CFR 60.420 – 63.429) [In accordance with 40 CFR 63.648(a) this emissions unit is a petroleum refinery process unit located at an existing major source of hazardous air pollutants subject to the emissions limitations/control measure specified in this section for loading racks and equipment leaks.]	See b)(2)k. through b)(2)q.
<i>When loading toluene and xylene:</i>		
g.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 12 of 40 CFR Part 63, Subpart EEEE, "General Provisions Applicability to Subpart EEEE" provides applicability provisions, definitions, and other general provisions of 40 CFR Part 63, Subpart A that are applicable to this emissions unit. See b)(2)e. through b)(2)j.
h.	40 CFR Part 63, Subpart EEEE (40 CFR 63.2330-63.2406) [In accordance with 63.2334(a) this facility has organic liquids distribution (OLD) (non-gasoline) operations that are located at an existing major source of HAP emissions and is subject to the emission limitations and control measures specified in this section.]	<i>Organic liquid transfer racks:</i> For all such loading arms at the rack, the permittee shall reduce emissions of total organic HAP (or, upon approval, TOC) from the loading of organic liquids either by venting the emissions that occur during loading through a closed vent system to any combination of control devices meeting the applicable requirements of 40 CFR part 63, Subpart SS, achieving at least 98 weight-percent HAP reduction; or Reduce emissions of total organic HAP to an exhaust concentration less than or equal to 20 ppmv, on a dry basis corrected to 3 percent oxygen for combustion devices using supplemental

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>combustion air; or</p> <p>During the loading of organic liquids, comply with the work practice standards specified in item 3 of Table 4 to this subpart.</p> <p>See b)(2)p., b)(2)q., and b)(2)r.</p> <p><i>Equipment leak components</i></p> <p>For each pump, valve, and sampling connection that operates in organic liquids service (non-gasoline) for at least 300 hours per year, the permittee shall comply with the applicable requirements under 40 CFR part 63, subpart TT (control level 1), subpart UU (control level 2), or subpart H. Pumps, valves, and sampling connectors that are insulated to provide protection against persistent sub-freezing temperatures are subject to the “difficult to monitor” provisions in the applicable subpart selected by the owner or operator.</p> <p><i>Transport vehicles</i></p> <p>Follow the steps in 40 CFR 60.502(e) to ensure that organic liquids are loaded only into vapor-tight transport vehicles and comply with the provisions in 40 CFR 60.502(f) through (i), except substitute the term “transport vehicle” at each occurrence of the term “tank truck” or “gasoline tank truck” in those paragraphs.</p>

- (2) Additional Terms and Conditions
- a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 63, Subpart R.
 - b. The permittee shall comply with the applicable operating restrictions, monitoring, recordkeeping and reporting requirements of OAC rule 3745-21-09(Q).

- c. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- d. The application and enforcement of the applicable provisions of Subpart XX of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- e. [40 CFR 63.2] and [Appendix F to 40 CFR Part 60]

The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- f. Compliance with the emission limitations, operating limits, and/or the work practice standards contained in this permit must be maintained at all times except during periods of startup, shutdown, and malfunction, and as specified in the NESHAP. The Director shall determine compliance with the applicable emission limitations, opacity limits, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, continuous monitoring system (CMS) performance evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

[Authority for term: 40 CFR 63.6(f)(1) and (2)]
- g. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:
 - i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.
 - ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.
 - iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.
 - iv. The SSMP shall be written for the following purpose:

- (a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;
 - (b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;
 - (c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and
 - (d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.
- v. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a “checklist” or other effective form of record keeping that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.
- vi. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit’s SSMP, and the unit’s emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.
- vii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.

- viii. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:
- (a) does not address a startup, shutdown, or malfunction event that has occurred;
 - (b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;
 - (c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or
 - (d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

- ix. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).
- x. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

- xi. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.
- xii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.
- xiii. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's SSMP.

[Authority for term: 40 CFR 63.6(e)(3) and 40 CFR 63.10(d)(5)]

- h. The internal quality assurance (QA) program, contained in the site-specific test plan shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision (e.g.: sampling and analysis of replicate samples). The external QA program shall include, at a minimum, the following elements:
 - i. provisions for a test method performance audit during the performance test, in order to provide a measure of test data bias;
 - ii. provisions for systems audits, instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities; and
 - iii. provisions to provide appropriate notice (60 days), to the Director, of the performance test, performance audit, and systems audit, allowing the regulating agency the opportunity to arrange for their own on-site evaluation.

[Authority for term: 40 CFR 63.7(c)(2)(ii) and (c)(2)(iii) and (c)(4)]

- i. In order to maintain ongoing data quality assurance for the continuous monitoring system (CMS), the permittee shall develop and implement a CMS quality control program. As part of the quality control program the permittee shall develop, and submit for approval, a site-specific performance evaluation test plan for the CMS, as required by 40 CFR 63.8(e) and this permit. The quality control program shall also include a written protocol that describes procedures for each of the following operations:
 - i. initial and any subsequent calibration of the CMS;
 - ii. determination and adjustment of the calibration drift of the CMS;
 - iii. preventive maintenance of the CMS, including spare parts inventory;

- iv. data recording, calculations, and reporting;
- v. accuracy audit procedures, including sampling and analysis methods; and
- vi. program of corrective action for a malfunctioning CMS.

The permittee shall keep these written procedures on record for the life of the emissions unit or until it is no longer subject to the NESHAP or other requirement for maintaining the system. The CMS quality control program shall be made available for inspection by the Director or his/her representative upon request. If the performance evaluation plan is revised, it shall be retained as a facility record for a period of 5 years following its revision.

[Authority for term: 40 CFR 63.8(d)]

- j. The permittee shall develop a site-specific continuous monitoring system (CMS) performance evaluation test plan and shall submit a copy to both the Central Office and the District Office or local air agency of the Ohio EPA Division of Air Pollution Control (DAPC) for evaluation and/or approval. A performance evaluation of each CMS shall be conducted in accordance with the approved site-specific performance evaluation test plan. The test evaluation of the CMS(s) shall demonstrate the precision and accuracy of the equipment and completeness of the data collected. The site-specific performance evaluation test plan shall require all CMS (systems required by rule) be maintained in continuous operation during process operations. The performance evaluation test plan shall include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external quality assurance (QA) program.
 - i. The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of CMS performance.
 - ii. The external QA program shall include, at a minimum, provisions for systems audits and validation of instrument calibration, data collection, sample logging, and documentation of quality control data and field maintenance activities and must also address the following requirements:
 - (a) each CMS (parameter monitor or sampling probe) shall be installed at a location that accurately measures the exhaust emissions representative of the emissions unit (e.g., on or downstream of the last control device) and accurately measures the process and/or the control device parameters;
 - (b) performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and
 - (c) performance evaluation procedures and acceptance criteria, including calibration frequency, results, and records.

The permittee shall submit the site-specific performance evaluation test plan to the Central Office and District or local offices of the Ohio EPA DAPC at least 60 days before the performance test or performance evaluation is scheduled to begin, or by a mutually agreed upon (by DAPC Central Office) date. The DAPC may request additional relevant information following the review of a site-specific performance evaluation test plan. All CMS shall be installed, operational, and the data verified, as specified in the NESHAP, either prior to or in conjunction with conducting performance tests required under 40 CFR 63.7.

[Authority for term: 40 CFR 63.8(e)(1), (2), and (3)]

k. [63.422(b)]

Emissions to the atmosphere from the vapor collection and processing systems due to the loading of the gasoline cargo tanks shall not exceed 10 mg total organic compounds (OC) per liter of gasoline loaded (0.083 pound total OC per 1,000 gallons of gasoline loaded).

l. [63.422(a)]

The permittee shall comply with the requirements in 40 CFR 60.502 of this chapter except for paragraphs (b), (c), and (j) of that section. For purposes of this section, the term "affected facility" used in 40 CFR 60.502 of this chapter means the loading racks that load gasoline cargo tanks at the bulk gasoline terminals subject to the provisions of 40 CFR 60, Subpart XX.

m. [60.502(a)]

The permittee shall employ a vapor collection system designed to collect the total OC vapors displaced from tank trucks during product loading.

n. [60.502(d)]

Each vapor collection system shall be designed to prevent any total OC vapors collected at one loading rack from passing to another loading rack.

o. [60.502(h)]

The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during loading.

[63.427(b)]

p. The permittee shall operate the vapor processing system in a manner not to exceed the OC concentration in the exhaust air stream determined during the most recent stack test which demonstrates compliance. Operation of the vapor processing system in a manner exceeding the operating parameter value shall constitute a violation of the emission standard in term b)(2)f.

q. [60.13 and 40 CFR 60, Appendix F]



The permittee shall maintain a written quality assurance/quality control plan for the continuous OC monitoring system, designed to ensure continuous valid and representative readings of OC emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous OC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous OC monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR 60, or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; however, the quarterly cylinder gas audit and relative accuracy audit frequency requirements may be adjusted to coincide with linearity checks completed for continuous emissions monitoring systems subject to 40 CFR Part 75, Appendix B requirements.

- r. The permittee shall comply with the requirements of 40 CFR 63, subpart EEEE when loading organic liquids (non-gasoline).

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a vapor collection system and a vapor control system with carbon adsorption at all times the unit is in operation..

[OAC rule 3745-31-05(A)(3), ORC 3704.03(T), 40 CFR 60, Subpart XX, 40 CFR 63, Subpart R and 40 CFR 63, Subpart EEEE]

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

- a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
- b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.

[OAC rule 3745-21-09(Q)(1)(a)]

- (3) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system;

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

[OAC rule 3745-21-09(Q)(1)(b), 40 CFR 63.422(b)]

- (4) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

[OAC rule 3745-21-09(Q)(1)(c)]

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

[OAC rule 3745-21-09(Q)(1)(d)]

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

[OAC rule 3745-21-09(Q)(2)]

- (7) See 40 CFR Part 60, Subpart XX (40 CFR 60.500-60.506).

- (8) See 40 CFR Part 63, Subpart R (40 CFR 63.420-63.429).

- (9) See 40 CFR Part 63, Subpart EEEE (40 CFR 63.2330-63.2406).

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

- (1) The permittee shall maintain daily records that document any time periods when each vapor control system serving this emissions unit was not in service when this emissions unit was in operation.

[OAC rule 3745-31-05(A)(3), ORC 3704.03(T), 40 CFR 60, Subpart XX, 40 CFR 63, Subpart R and 40 CFR 63, Subpart EEEE]

- (2) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

[OAC rule 3745-21-09(Q)(1)(a)(ii)]

- (3) See 40 CFR Part 60, Subpart XX (40 CFR 60.500-60.506).

- (4) See 40 CFR Part 63, Subpart R (40 CFR 63.420-63.429).

- (5) See 40 CFR Part 63, Subpart EEEE (40 CFR 63.2330-63.2406).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any time during which the vapor collection system was not in service when this emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit quarterly excess emissions reports which shall include any malfunctions or downtime of the process, CEMS, or the vapor recovery unit. This report shall include a summary of the following records:
- a. the facility name and facility ID number;
 - b. the total operating time of the loading rack during the reporting period;
 - c. the total operating time of the VOC CEMS during the reporting period;
 - d. the amount of time spent in startup/shutdown operations;
 - e. the manufacturer(s) and model number(s) of the VOC CEMS and its recorder;
 - f. the date of the latest CEMS certification (i.e., Relative Accuracy Test Audit (RATA)) or cylinder gas audit and the results if not previously reported;
 - g. the date and time identifying each period during which the CEMS was inoperative except for zero (low-level) and high-level checks, the nature of any repairs or adjustments to the CEMS or its recorder, and a description of the corrective actions;
 - h. the start and end date(s) and the number of hours of each period of time during which the CEMS was out of control, and a description of the corrective actions taken to bring it back to normal operation;
 - i. the date, time, and duration of any/each malfunction of the VOC CEMS and/or control equipment (or out of control period) while the emissions unit was in operation and any corrective action taken or preventive measures adopted to remedy each malfunction;
 - j. the total duration of excess emissions during the reporting period;
 - k. the total CEMS downtime while the loading rack was in operation during the reporting period, to include quality assurance/quality control, (i.e., cylinder gas audits, calibrations, etc.);

- l. the total CEMS downtime while the loading rack was in operation, excluding quality assurance/quality control (i.e., cylinder gas audits, calibrations, etc.);
- m. the total operating time of the loading rack minus CEMS downtime that is not due to QA/QC, audits, or calibrations;
- n. identification of each time period of excess emissions (i.e., the date and duration) that occurred during periods of:
 - i. startups and shutdowns of the emissions unit;
 - ii. process problems of the emissions unit;
 - iii. malfunction of the control equipment; and
 - iv. other identified or unknown causes.
- o. a breakdown of the total duration of excess emissions, as a percent of the total source operating time during the reporting period, into those that are due to startup/shutdown, process problems, control equipment problems, and other known and unknown causes;
- p. the total duration of excess emissions, expressed as a percent of the total source operating time during the reporting period;
- q. the total duration of CEMS downtime expressed as a percent of the total source operating time during that reporting period;
- r. the total duration of CEMS downtime excluding quality assurance/quality control and calibration checks, expressed as a percent of the total source operating time during that reporting period;
- s. a breakdown of the total CEMS downtime during the reporting period into periods that are due to quality assurance/quality control calibrations, monitoring equipment malfunctions, non-monitoring equipment malfunctions, and other known and unknown causes;
- t. a description of any changes made to the CEMS, process, or control device since the last quarterly report, including any change to the CEMS hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe; and
- u. the date of the report along with the name, title, and signature of the responsible official who is certifying the accuracy of the report.



All required excess emissions and monitoring system performance reports and/or summary reports shall be delivered to the Ohio EPA Division of Air Pollution Control district office or local air agency and shall be postmarked by the 30th day following the end of each calendar quarter. Quarterly shall mean January through March, April through June, July through September, and October through December..

[Authority for term: 40 CFR 63.10(e)(3), 40 CFR 63.8(c)(8), and OAC 3745-15-03(B) and (C)]

(3) See 40 CFR Part 60, Subpart XX (40 CFR 60.500-60.506).

(4) See 40 CFR Part 63, Subpart R (40 CFR 63.420-63.429).

See 40 CFR Part 63, Subpart EEEE (40 CFR 63.2330-63.2406).

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

f) Testing Requirements

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

a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 5.1 tons per month average over a twelve-month rolling period.

Applicable Compliance Method:

The ton per month emission limitation was developed by determining the sum of the stack emissions from gasoline loading, fugitive emissions from gasoline loaded, and fugitive emissions from equipment leaks. The potential gasoline throughput (838,857,600 gallons/yr) was multiplied by the allowable stack emissions from loading gasoline (10 mg/l = 0.000083 lb/gal) to determine the stack emissions from gasoline loading (34.81 tons VOC/yr). The fugitive emissions were determined by multiplying the potential gasoline throughput (838,857,600 gal/yr) by the uncontrolled gasoline emission factor for gasoline RVP 10 with 10% ethanol as determined by AP-42 Fifth Edition Section 5.2 dated 6/08 (6.28 lb VOC/1000 gallons loaded) multiplied by one minus the decimal fraction design capture efficiency (1-0.992) and divided by 2000 pounds per ton to determine the fugitive emissions from gasoline loading (21.0 tons VOC/yr). The fugitive emissions from equipment leaks were calculated using leak/no leak emission factors assuming 2% leaking components using Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) and were determined to be 5.72 tons VOC/yr. The sum of the above emissions (34.81 + 21.0 + 5.72 tons/yr) was divided by 12 months per year to determine the tons per month allowable emissions averaged over a twelve-month rolling period (5.1 tons/month).

b. Emission Limitation:

10 mg of OC per liter of gasoline

Applicable Compliance Method:

The monitoring and recordkeeping requirements of d)(4) (40 CFR 63.420-63.429) shall serve as demonstration of compliance with this emission limitation.

Compliance shall be demonstrated through emission testing performed on the vapor processing and collection systems using the test methods in 40 CFR 60.503 and using readings of 500 ppm to determine leaks to be repaired as required by 40 CFR 63.425.

c. Emission Limitation:

For all such loading arms at the rack, reduce emissions of total organic HAP (or, upon approval, TOC) from the loading of organic liquids either by venting the emissions that occur during loading through a closed vent system to any combination of control devices meeting the applicable requirements of 40 CFR part 63, Subpart SS, achieving at least 98 weight-percent HAP reduction; or

Reduce emissions of total organic HAP to an exhaust concentration less than or equal to 20 ppmv, on a dry basis corrected to 3 percent oxygen for combustion devices using supplemental combustion air.

Applicable Compliance Method:

The monitoring and recordkeeping requirements of d)(5) (40 CFR 63.2330-63.2406) shall serve as demonstration of compliance with this emission limitation.

When required, compliance shall be demonstrated through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR Part 63, Section 63.2354 and the procedures specified in Method 25A of 40 CFR Part 60, Appendix A.

(2) The permittee shall conduct, or have conducted, initial emission testing for J006 in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. Additional testing may be required consistent with Ohio EPA DAPC Engineering Guide #16 or by request of the Ohio EPA or Toledo Division of Environmental Services.

b. The testing shall be conducted to demonstrate compliance with the allowable total organic HAP emissions weight-percent reduction and the allowable concentration of OC in the exhaust stream of the carbon adsorption vapor recovery unit (10 mg/L).

- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- i. For the total organic HAP emissions weight-percent reduction, the methods and procedures specified in 40 CFR Part 63, Sections 63.2354, 63.990, and 63.997;
 - ii. For the 10 mg OC/L gasoline loaded, the methods and procedures specified in 40 CFR 63.425 and 40 CFR 63.503, except as provided in 60.8(b). The three run requirement in 60.8(f) does not apply to this emissions unit.

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

- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. But when determining compliance with the 10 mg OC/L gasoline loaded emission limitation, no less than 80,000 gallons of gasoline shall be loaded during the test, unless otherwise specified or approved by the Toledo Division of Environmental Services. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Services refusing to accept the results of the emission test(s).
- f. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date: 6/29/2016

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services") within 30 days following the completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.425(a), 63.7].

g) Miscellaneous Requirements

- (1) None.

2. T177, Ethanol IFRT

Operations, Property and/or Equipment Description:

420,000 gal Internal Floating Roof Ethanol Tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)b., b)(2)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Volatile organic compound (VOC) emissions shall not exceed 0.02 ton per month averaged over a twelve-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under 3745-31-03(A)(3) do not apply to VOC since the potential to emit is less than 10 tons per year See b)(2)b.
c.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	See b)(2)c.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b) [In accordance with 63.110b, this subpart applies to each storage vessel with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids (VOL) for which construction commenced after July 23, 1984]	The permittee shall comply with the applicable requirements for monitoring of operations of each storage vessel containers per the definition in 60.110b(a) for storage vessels. See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the



less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

The following terms shall become void after U.S. EPA approves the rule revision:

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

- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- d. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b).

e) Reporting Requirements

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

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 0.02 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be determined using the latest version of TANKS software (TANKS 4.09d) or equivalent, the annual throughput and the annual average vapor pressure.



Final Permit-to-Install
Toledo Terminaling Company LLC
Permit Number: P0120717
Facility ID: 0448020109
Effective Date: 6/29/2016

g) Miscellaneous Requirements

(1) None.