



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

7/11/2016

Certified Mail

Mr. John Denton
 DELTA FUELS, INC
 40600 Grand River Ave
 Novi, MI 48675

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448010387
 Permit Number: P0120795
 Permit Type: Administrative Modification
 County: Lucas

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

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

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

Sincerely,



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

Cc: TDES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
DELTA FUELS, INC**

Facility ID:	0448010387
Permit Number:	P0120795
Permit Type:	Administrative Modification
Issued:	7/11/2016
Effective:	7/11/2016
Expiration:	8/20/2018



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

for
DELTA FUELS, INC

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Final Permit-to-Install and Operate
DELTA FUELS, INC
Permit Number: P0120795
Facility ID: 0448010387
Effective Date: 7/11/2016

Authorization

Facility ID: 0448010387
Application Number(s): M0003989
Permit Number: P0120795
Permit Description: Administrative modification to J001 to add retesting requirement for less than 90% maximum throughput experienced during a 2013 stack test.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/11/2016
Effective Date: 7/11/2016
Expiration Date: 8/20/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

DELTA FUELS, INC
1820 FRONT ST
Toledo, OH 43605

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
DELTA FUELS, INC
Permit Number: P0120795
Facility ID: 0448010387
Effective Date: 7/11/2016

Authorization (continued)

Permit Number: P0120795

Permit Description: Administrative modification to J001 to add retesting requirement for less than 90% maximum throughput experienced during a 2013 stack test.

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

Emissions Unit ID:	J001
Company Equipment ID:	J001 Loading Rack
Superseded Permit Number:	P0115246
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
DELTA FUELS, INC
Permit Number: P0120795
Facility ID: 0448010387
Effective Date: 7/11/2016

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
DELTA FUELS, INC
Permit Number: P0120795
Facility ID: 0448010387
Effective Date: 7/11/2016

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBB, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipelines. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
DELTA FUELS, INC
Permit Number: P0120795
Facility ID: 0448010387
Effective Date: 7/11/2016

C. Emissions Unit Terms and Conditions

1. J001, J001 Loading Rack

Operations, Property and/or Equipment Description:

Load rack - transfer of petroleum products

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)	the emissions of volatile organic compounds (VOC) from the adsorber stack shall not exceed 36.5 tons per year see b)(2)a. thru e.
b.	OAC rule 3745-21-09(Q)	see b)(2)f.
c.	40 CFR Part 60 Subpart XX	exempt, see b)(2)g.
d.	40 CFR Part 63, Subpart R	exempt, not a major source of HAPS per 40 CFR Section 63.420

(2) Additional Terms and Conditions

a. The permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of RVP 15 gasoline.

- b. For gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol: the stack emissions of VOC shall not exceed 0.43 pound per 1,000 gallons loaded into the delivery vessel.
 - c. For ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2: the emissions of VOC shall not exceed 0.52 pound of VOC per 1,000 gallons loaded into the delivery vessel.
 - d. For distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2: the emissions of VOC shall not exceed 0.015 pound of VOC per 1,000 gallons loaded into the delivery vessel.
 - e. The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be less than 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling, 12-month summations. These annual emission limitations were established to reflect the potential to emit for this facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
 - f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B)(2).
 - g. No construction or modification (as defined in by 40 CFR 60.14) which commenced after December 17, 1980, has affected those loading racks which deliver liquid product into gasoline tank trucks (as defined by 40 CFR 60.501).
- c) Operational Restrictions
- (1) The annual throughputs of organic liquids in this emissions unit shall not exceed;
 - a. 120,000,000 gallons per year of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;
 - b. 40,000,000 gallons per year of ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and
 - c. 40,000,000 gallons per year of distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.
- Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.
- (2) The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. A VOC concentration that exceeds 3% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

- (3) 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.
 - (4) 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; and
 - 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.
 - (5) 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.
 - (6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (7) 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.
 - (8) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) For each day during which the permittee loads organic liquids with a true vapor pressure greater than that of RVP 15 gasoline in this emissions unit, the permittee shall maintain a record of the type and quantity of organic liquid loaded.
 - (2) The permittee shall maintain monthly records for this emissions unit of the total throughput (loadout volumes) in gallons per month, and the rolling, 12-month summation of the throughput, in gallons per year;
 - a. for gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;
 - b. for ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and

- c. for distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.
- (3) The permittee shall maintain daily records of the following information:
 - a. the total throughput for emissions unit J001 (volume loaded) for gasoline.
- (4) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.
- (5) 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).
- (6) The permittee shall maintain a daily log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.
- (7) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. the daily throughput for emissions unit J001 (volume loaded) for gasoline;
 - b. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The annual throughputs of organic liquids in this emissions unit shall not exceed;
 - (a) 120,000,000 gallons per year of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;



- (b) 40,000,000 gallons per year of ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and
- (c) 40,000,000 gallons per year of distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.

Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.

- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

For gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol: the stack emissions of VOC shall not exceed 0.43 pound per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

Compliance shall be demonstrated by the results of the most recent stack test performed on this emissions unit (0.22 pound VOC per 1,000 gallons of gasoline based on testing performed November 5-6, 2013).



If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed OAC rule 3745-21-10(E). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

For ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2: the emissions of VOC shall not exceed 0.52 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emission limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$$L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (0.6 for submerged loading dedicated normal service - AP-42 Table 5.2-1)

P = true vapor pressure, psia (ethyl alcohol = 0.619 - AP-42 Table 7.1-2)

M = molecular weight, lb/lb mole (distillate = 46.07)

T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

c. Emission Limitation:

For distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2: the emissions of VOC shall not exceed 0.015 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emission limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:



$$L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (0.6 for submerged loading dedicated normal service - AP-42 Table 5.2-1)

P = true vapor pressure, psi_a (distillate = 0.0065 - AP-42 Table 7.1-2)

M = molecular weight, lb/lb-mole (distillate = 130)

T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

d. Emission Limitation:

The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be less than 10 tons per year of any individual HAP, and 25 tons per year for any combination of HAPs, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated by a one-time calculation following the procedure for the determination of MACT applicability given in 40 CFR Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations, Section 63.420 - Applicability), where compliance is determined by a calculated value of ET of less than 1.0, as follows:

$$ET = CF [0.59(T_F)(1-CE) + 0.17(T_E) + 0.08(T_{ES}) + 0.038(T_i) + 8.5 \times 10^{-6}(C) + KQ] + 0.04(OE)$$

$$ET = 0.161[0.59(0)(1-0) + 0.17(0) + 0.08(0) + 0.038(3) + 8.5 \times 10^{-6}(1000) + (4.52 \times 10^{-9})(52+13)(1.24 \times 10^6)] + 0.04(0.28)$$

$$ET = 0.161 [(0) + (0) + (0) + (0.114) + (0.009) + (0.364)] + (0.011)$$

$$ET = 0.161 [0.487] + (0.011)$$

$$ET = 0.089$$

where:

ET = emissions screening factor for bulk gasoline terminals, this number will be less than 1.0 if the facility is a minor source for HAPs

CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater methyl tert-butyl ether (MTBE),

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels = 0;

T_F = total number of fixed-roof gasoline storage vessels without an internal floating roof = 0;

T_E = total number of external floating roof gasoline storage vessels with only primary seals = 0;

T_{ES} = total number of external floating roof gasoline storage vessels with primary and secondary seals = 0;

T_I = total number of fixed-roof gasoline storage vessels with an internal floating roof; There are three permitted IFR gasoline storage tanks = 3 (emissions units T003 thru T005);

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service = 1000 (897 was existing number in 1996 submittal);

Q = gasoline throughput limitation on potential to emit (liters/day) = 120,000,000 gal/yr (3.7854 l/gal)(1 yr/365 d) = 1.24x10⁶ l/d

K = (4.52x10⁻⁹)(EF + L) for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded) = 0.43 lb/1000 gal (1000 gal/3785.4 l)(454,000 mg/lb) = 52 mg/l;

OE = other HAP emissions screening factor for bulk gasoline terminals (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equation for ET = 0.28 tons per year based on an analysis submitted by the company on 6/4/2001.

L = 13 mg/l for gasoline cargo meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in 40 CFR 60.501.

Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable in a written agreement to the Ohio EPA, the Toledo Division of Environmental Services and the permittee.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 12 months of issuance of a renewal permit and within 12 months prior to permit expiration, and shall be performed between April 30 and May 31.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate from VOC for gasoline loading.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 2A, 21 and 25B of 40 CFR Part 60, Appendix A and 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 Toledo Division of Environmental Services.
 - e. At least once during the testing period, the permittee shall perform monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The maximum exhaust gas VOC concentration in % (as propane), measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Services refusing to accept the results of the emission test(s).
 - g. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s).
- (3) This emissions unit has a stated maximum throughput of 120,000,000 gallons per year (328,800 gallons per day) of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol. Average daily throughput levels achieved during the November 5-6, 2013 stack testing for gasoline loading was 208,800 gallons per day. Ohio EPA stack testing policy requires a review of the stack test results for



Final Permit-to-Install and Operate

DELTA FUELS, INC

Permit Number: P0120795

Facility ID: 0448010387

Effective Date: 7/11/2016

sources where the throughput exceeds more than 10% the production rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for VOC emissions (228,809 gallons per day). Operation at a throughput greater than the compliant level is not indicative of an emission violation, but rather serves as a trigger level for additional testing to demonstrate compliance with the emission limitations at the higher throughput rate. The permittee may increase the daily throughput by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-21-10(E), at a higher average daily throughput.

g) Miscellaneous Requirements

(1) None.