



State of Ohio Environmental Protection Agency

O.E.P.A.
S.E.D.O.

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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2008 MAY 12 AM 10:00

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/06/08

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

T002 (Tank 2) Tank 2-55,000 BBL Crude Oil
Storage Tank

ERGON Trucking Inc.-Marietta (06-84-02-0225)
Jake Neihaus
P.O. Box 1639
Jackson, MS 39215-1639

Dear Jake Neihaus:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (800) 329-7518. For more information related to air pollution control in Ohio, visit www.epa.state.oh/dapc.

You are hereby notified that this action of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Southeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 05/06/08

Expiration Date: 05/06/13

This document constitutes issuance to:

Facility ID: 06-84-02-0225
ERGON Trucking Inc.-Marietta
State Route 7
Marietta, OH 45750

of a permit to operate for:

T002 (Tank 2)
Tank 2-55,000 BBL Crude Oil Storage Tank

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in cursive script that reads "Chris Korleski".

Chris Korleski
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine

compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
55,000 bbl (2,310,000 gal) Crude Oil Storage Tank	OAC rule 3745-31-05(A)(3) PTI # 06-5586	Emissions of Volatile Organic Compounds (VOC) shall not exceed 0.88 ton/yr.
	OAC rule 3745-21-09(L)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L)(1) and 40 CFR Part 60, Subpart Kb (NSPS).
	40 CFR Part 60, Subpart Kb	See B.1. below.
		See A.2.a below.

2. Additional Terms and Conditions

- 2.a This storage tank shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications:
- i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - ii. The internal floating roof shall be equipped with two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - iii. Each opening in the noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

2. Additional Terms and Conditions (continued)

- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

B. Operational Restrictions

1. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
2. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
3. The maximum true vapor pressure of any Volatile Organic Liquid (VOL) stored in this emissions unit shall not exceed 11.11 psia.

C. Monitoring and/or Record Keeping Requirements

1. In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

Source Number	Tank Size
T002	55000 bbl (2,310,000 gal)
2. The permittee shall maintain records of the following information:
 - a. The Volatile Organic Liquid (VOL) stored in the tank.
 - b. The period of storage.
 - c. The maximum true vapor pressure of the stored VOL during the respective storage period.
3. The permittee shall perform visual inspections as specified in item a. or b. below. If the permittee conducts annual visual inspections in accordance with item a., inspections as described in item b. must be conducted at least once every 10 years.
 - a. The permittee shall visually inspect the internal floating roof and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA Southeast District Office in the inspection report required by Section D.1. of this permit. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

C. Monitoring and/or Record Keeping Requirements (continued)

- b. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. Inspections shall be conducted in accordance with this item at least every 5 years. If annual visual inspections are conducted in accordance with item a., inspections shall be conducted in accordance with this item at least every 10 years.
4. The permittee shall keep a record of each inspection performed. The record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
5. The permittee shall notify the Ohio EPA Southeast District Office in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section C.3.b. of this permit to afford the Ohio EPA Southeast District Office the opportunity to have an observer present. If the inspection required by section C.3.b. is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the Ohio EPA Southeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by the Ohio EPA Southeast District Office at least 7 days prior to the refilling.

D. Reporting Requirements

1. After each inspection required by section C.3. that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in section C.3.a., a report shall be furnished to the Ohio EPA Southeast District Office within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of section A.2.a and list each repair made.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any record showing that any VOL stored in the tank exceeded the vapor pressure limitation specified above. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
- VOC emissions shall not exceed 0.88 ton/yr.
- Compliance Method:
- Compliance shall be determined by a one time calculation using the TANKS Program 4.0 or other method acceptable to the Ohio EPA Southeast District Office.

F. Miscellaneous Requirements

None

