



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

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

99 OCT -8 AM 11:39

Re: Permit to Install
Washington County
Application No: 06-5586
NSPS

CERTIFIED MAIL

October 6, 1999

ERGON TRUCKING INC - MARIETTA
WADE PARTICK
P O BOX 1639
JACKSON, MS 39215

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

Permit to Install Terms and Conditions

Application No. 06-5586
APS Premise No. 0684020225
Permit Fee: \$4900.00

Name of Facility: ERGON TRUCKING INC - MARIETTA

Person to Contact: WADE PARTICK

Address: P O BOX 1639
JACKSON, MS 39215

Location of proposed source(s): SOUTH SIDE OF STATE ROUTE 7
NEWPORT TOWNSHIP, OHIO

Description of proposed source(s):
2-55,000 BBL CRUDE OIL STORAGE TANKS, BARGE LOADING, AND 1-2
0,305 GALLON DIESEL STORAGE TANK.

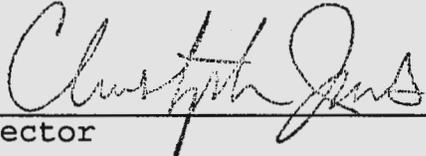
Date of Issuance: October 6, 1999

Effective Date: October 6, 1999

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

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APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Facility Name** located in **Location of County**. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u>	Source Identification <u>Description</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
T001	55,000 bbl Storage Tank (Crude Oil)	Internal floating roof	3745-31-05	0.88 ton of VOC emissions per year
			3745-21-09 (L)	See A.2 in Additional Special Terms and Conditions T001
			40 CFR 60 Subpart Kb	Recordkeeping per general terms and conditions
T002	55,000 bbl Storage Tank (Crude Oil)	Internal floating roof	3745-31-05	0.88 ton of VOC emissions per year
			3745-21-09 (L)	See A.2 in Additional Special Terms and Conditions T002

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T002 Cont'd			40 CFR 60 Subpart Kb	Recordkeeping per general terms and conditions
T003	20,305 gal. Storage Tank (Diesel Fuel)	Submerge fill	3745-31-05	0.01 ton of VOC emissions per year Storage tank shall be equipped with submerge fill
			3745-21-09(L)	Exempt A.2 in Additional Special Terms and Conditions T003
			40 CFR 60 Subpart Kb	Recordkeeping per general terms and conditions
J001	Barge Loading	Top load fully submerge fill	3745-31-05	27.85 tons of VOC emissions per year Barge loading shall be by top load fully submerge fill only.

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	29.61

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T001	55,000 bbl Storage Tank	Kb
T002	55,000 bbl Storage Tank	Kb
T003	20,305 gal. Storage Tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

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and Ohio EPA, Southeast District Office
2195 Front Street
Logan, OH 43138

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.

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Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

DIESEL AND/OR KEROSENE DISPENSING FACILITIES

BAT for any diesel and/or kerosene dispensing operation identified within this permit consists of the transfer of diesel and/or kerosene from a delivery vessel to a stationary storage tank through the use of submerged filling into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

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.

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

<u>Source Number(s)</u>	<u>Tank Size</u>
T001	55,000 bbl Storage Tank
T002	55,000 bbl Storage Tank
T003	20,305 gal. Storage Tank

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CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

T001

A. Special Terms and Conditions

1. The fixed roof storage tank shall be equipped with an internal floating roof.
 - a. 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.
 - b. 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.

B. Operational Restrictions

None.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of petroleum liquids stored in the tank.
 - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid

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that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

D. Reporting Requirements

None.

E. Testing Requirements

1. Compliance with the emission limitation of 0.88 tons of VOC per year shall be determined by using Tanks Program 3.0 emission calculations

F. Miscellaneous Requirements

None.

T002

A. Special Terms and Conditions

1. The fixed roof storage tank shall be equipped with an internal floating roof.
 - a. 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.
 - b. 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.

B. Operational Restrictions

None.

C. Monitoring and/or Record Keeping Requirements

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

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

D. Reporting Requirements

None.

E. Testing Requirements

1. Compliance with the emission limitation of 0.88 ton of VOC per year shall be determined by using Tanks Program 3.0 emission calculations

F. Miscellaneous Requirements

None.

T003

A. Special Terms and Conditions

1. In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.
2. This emissions unit shall use submerged fill only.

B. Operational Restrictions

None.

C. Monitoring and/or Record Keeping Requirements

None.

D. Reporting Requirements

None.

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E. Testing Requirements

1. Compliance with the emission limitation of 0.01 tons of VOC per year shall be determined by using Tanks Program 3.0 emission calculations

F. Miscellaneous Requirements

None.

J001

A. Special Terms and Conditions

None.

B. Operational Restrictions

1. Barge loading shall be by top load fully submerge fill only.

C. Monitoring and/or Record Keeping Requirements

None.

D. Reporting Requirements

None.

E. Testing Requirements

1. Compliance with the emission limitation of 27.85 tons of VOC per year shall be determined by using an emission factor of:

$$\frac{1.02 \text{ pounds VOC}}{27.85 \text{ TPY}} \times \frac{1.3 \times 10^6 \text{ Bbl}}{1,000 \text{ gallon year bbl}} \times 42 \text{ gal} \times \frac{\text{Ton}}{2000 \text{ lb}} =$$

- a. The emission factor of 1.02 pounds of VOC per 1,000 gallon through-put of crude oil was determined by using emission factors from AP-42 page 5.2-9 (dated 1/95) and emission calculation in AP-42 5.2-9 (dated 1/95).

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F. Miscellaneous Requirements

None.

