



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

9/2/2016

Certified Mail

Greg Moore
 MPLX Terminals LLC - Brecksville Terminal
 539 South Main Street
 TT&R - HES&S
 Findlay, OH 45840

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	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: 1318082830
 Permit Number: P0120594
 Permit Type: Administrative Modification
 County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297 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: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MPLX Terminals LLC - Brecksville Terminal**

Facility ID:	1318082830
Permit Number:	P0120594
Permit Type:	Administrative Modification
Issued:	9/2/2016
Effective:	9/2/2016
Expiration:	3/12/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
MPLX Terminals LLC - Brecksville Terminal

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?.....	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
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?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions.....	9
C. Emissions Unit Terms and Conditions	16
1. J001, Loading Racks/VRU	17
2. T001, Tank 55-3.....	32
3. T002, Tank 35-1.....	35
4. T003, Tank 35-9.....	37
5. T004, Tank 55-12.....	39
6. T005, Tank 55-7.....	42
7. T006, Tank 15-11.....	44
8. T007, Tank T-5	48
9. T010, Tank 80-4.....	50



10. T011, Tank 80-6.....	53
11. T012, Tank 35-2.....	56
12. T018, Tank AA-10-2.....	59



Final Permit-to-Install and Operate
MPLX Terminals LLC - Brecksville Terminal
Permit Number: P0120594
Facility ID: 1318082830
Effective Date: 9/2/2016

Authorization

Facility ID: 1318082830
Application Number(s): M0003854
Permit Number: P0120594
Permit Description: Administrative modification permit to address the installation of a new continuous emissions monitoring system (CEMS) at the terminal.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 9/2/2016
Effective Date: 9/2/2016
Expiration Date: 3/12/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MPLX Terminals LLC - Brecksville Terminal
10439 BRECKSVILLE RD.
Brecksville, OH 44141

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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



Authorization (continued)

Permit Number: P0120594

Permit Description: Administrative modification permit to address the installation of a new continuous emissions monitoring system (CEMS) at the terminal.

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:	Loading Racks/VRU
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T001
Company Equipment ID:	Tank 55-3
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Tank 35-1
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Tank 35-9
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Tank 55-12
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Tank 55-7
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T006
Company Equipment ID:	Tank 15-11
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	Tank T-5
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T010
Company Equipment ID:	Tank 80-4
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T011
Company Equipment ID:	Tank 80-6
Superseded Permit Number:	P0095168
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
MPLX Terminals LLC - Brecksville Terminal
Permit Number: P0120594
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Emissions Unit ID:

Company Equipment ID: Tank 35-2
Superseded Permit Number: P0095168
General Permit Category and Type: Not Applicable

T012

Emissions Unit ID:

Company Equipment ID: Tank AA-10-2
Superseded Permit Number: P0095168
General Permit Category and Type: Not Applicable

T018



Final Permit-to-Install and Operate
MPLX Terminals LLC - Brecksville Terminal
Permit Number: P0120594
Facility ID: 1318082830
Effective Date: 9/2/2016

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
MPLX Terminals LLC - Brecksville Terminal
Permit Number: P0120594
Facility ID: 1318082830
Effective Date: 9/2/2016

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.

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) b), c), d), e), f) and g)

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) FEPTIO to avoid Title V and MACT Applicability	See b)(2)a. below.

(2) Additional Terms and Conditions

a. The total combined annual emissions from all facility emissions units, including permit to install and operate exempt and "de minimis" emissions units, shall not exceed the following as rolling, 12- month summations:

- i. 99.5 tons of volatile organic compounds (VOC);
- ii. 24.5 tons of combined hazardous air pollutants (HAPs); and
- iii. 9.8 tons of individual HAP.

c) Operational Restrictions

(1) Limit fuel throughput at the loading rack (J001) as specified in Section C.1.c)(1).

d) **Monitoring and Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:
 - a. the calculated, total VOC and HAP (individual and combined HAPs) emissions (in tons);
 - b. the rolling, 12-month summations of VOC and HAP (individual and combined HAPs) emissions (in tons) from gasoline/transmix and distillates for all emission units at the facility, in tons; and
 - c. the rolling, 12-month summation of fuel throughput at the loading rack (J001), as specified in Section C.1.d)(1).

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. 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 rolling, 12-month VOC emission limitation of 99.5 tons;
 - ii. the rolling, 12-month individual HAP emissions limitation of 9.8 tons; and
 - iii. the rolling, 12-month combined HAPs emissions limitation of 24.5 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. 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 Cleveland Division of Air Quality (Cleveland DAQ).

- (2) 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 emission limitations in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

99.5 tons per year of VOC as a rolling, 12-month summation from all facility emissions units.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to d)(1) above.

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

- i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7;
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017; "Protocol for Equipment Leak Emission Estimates."
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10); and
- iv. The VOC emissions from gasoline, transmix or distillate truck loading shall be determined as specified in Section C.1.c)(1).

b. Emission Limitations:

24.5 tons of combined HAPs per rolling, 12-month summation from all facility emissions units.

9.8 tons of any individual HAP per rolling, 12-month summation from all facility emissions units.

Applicable Compliance Method:

Compliance with these emission limitations shall be based upon the records required pursuant to d)(1) above.

To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in b)(2)a., the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all VOC emissions from fuel loading and storage activities at the facility, including fugitive emissions and then add the potential HAP emissions from de minimis sources. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline.

The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:



- i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions;
- ii. toluene - 0.013 pound of toluene emissions per pound of VOC emissions;
- iii. xylene - 0.005 pound of xylene emissions per pound of VOC emissions;
- iv. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- v. hexane - 0.016 pound hexane emissions per pound of VOC emissions;
and
- vi. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions.

To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the CDAQ and the permittee.

g) **Miscellaneous Requirements**

- (1) The Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63 Subpart BBBB, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, 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 these rules are in effect and are enforceable 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>.

- (2) The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart XX: J001.

The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart K: T010, T011, and T012.

The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb: T006.

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.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality.

The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart XX, Subpart K, and Subpart Kb. Compliance with all applicable requirements shall be achieved by the dates set forth in the respective subparts.



The following table identifies the potential to emit (PTE) for all VOC generating emissions units located at this facility:

Brecksville Light Products Terminal VOC PTE Summary		
Ohio EPA ID	Company ID	VOC (tons per year)
J001	Loading Rack	64.7
G001	Truck Refueling	0.16 ^b
P001	Water Sparging System	0.74 ^b
T001	55-3	3.73
T002	35-1	0.96
T003	35-9	0.13
T004	55-12	5.08
T005	55-7	0.81
T006	15-11	2.25 (PTI 13-02469)
T007	T-5	0.79
T010	80-4	7.90
T011	80-6	8.48
T012	35-2	0.77 ^b
T013	AA8-1	9.0E-0.4 ^b
T015	WA-10-1N	0.10 ^b
T016	WA-10-2S	0.10 ^b
T018	AA10-2	0.75 (PTI 13-02468)
T020	AA1-3	6.5E-0.5 ^b
N/A	RB-10-1	2.8E-03 ^b
N/A	Oil/Water Separator	0.07 ^b
N/A	Piping Components - LDAR	1.42 ^b
N/A	Parts Washer	0.12 ^b
N/A	Reznor Space Heater	9.4E-04 ^b
N/A	Arc Welding Station	- ^b
N/A	Roadway Emissions	- ^b
N/A	Testing Facility	0.42 ^b
Total^a:		99.5



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^a Represents total VOC PTE for all sources, with the exception of the Loading Rack (J001), for which the throughput will be synthetically limited to maintain facility-wide VOC emissions below 100 TPY.

^b Source is de minimis pursuant to OAC 3745-15-05(B), based on potential to emit.



Final Permit-to-Install and Operate
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C. Emissions Unit Terms and Conditions



1. J001, Loading Racks/VRU

Operations, Property and/or Equipment Description:

Bottom Loading Racks (4) equipped with a vapor recovery unit (VRU) or a backup portable combustor during VRU maintenance or malfunction.

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. 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.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT applicability	<u>Gasoline and Transmix Loading Controlled by Vapor Recovery Unit (VRU):</u> 0.083 pound of VOC per 1,000 gallons (10.0 mg/l) of gasoline loaded into the delivery vessel. <u>Gasoline and Transmix Loading Controlled by Portable Backup Combustor:</u> 0.167 pound of VOC per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel. <u>Distillate Loading (diesel fuels, fuel oils, and kerosene) Controlled by Vapor</u>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Recovery Unit (VRU):</u> 0.014 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel.</p> <p><u>Distillate Loading (diesel fuels, fuel oils, and kerosene) Controlled by Portable Backup Combustor:</u> 0.167 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel.</p> <p><u>Tank Truck Fugitive Losses:</u> 0.108 pound of VOC per 1,000 gallons of gasoline and transmix loaded into the delivery vessel. 0.00051 pound of VOC per 1,000 gallons of distillate loaded into the delivery vessel.</p> <p>The total annual VOC emissions from this emissions unit shall not exceed 64.7 TPY, as a rolling 12-month summation of emissions.</p> <p>See c)(1)-(2) below.</p>
b.	OAC rule 3745-21-09(Q)	<p>The VOC emission limitation specified by this rule is less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31 05(D)(1)(b).</p> <p>See c)(3) through (9); d)(5) and (6); and e)(2) below.</p>
c.	<p>40 CFR Part 60, Subpart XX (40 CFR 60.500 – 506)</p> <p>[In accordance with 40 CFR 60.500, this emission unit is a loading rack at a bulk gasoline terminal which is subject to the emissions limitations and/or control measures specified in this section.]</p>	See c)(11), d)(13), f)(7), and g)(2) below.

(2) Additional Terms and Conditions

- a. Each continuous VOC monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9.
- b. 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.

c) Operational Restrictions

- (1) Compliance with the emission limitations as specified in b)(1)a. shall be achieved by restricting the annual throughput of refined petroleum products based upon a rolling, 12-month summation and the following two equations:

When the CEMS is out of service or during periods of CEMS malfunction:

$$\frac{[(X) * (0.083 \text{ lb VOC}/1,000 \text{ gal})] + [(Y) * (0.167 \text{ lb VOC}/1,000 \text{ gal})] + [(XX) * (0.00014 \text{ lb VOC}/1,000 \text{ gal})] + [(YY) * (0.167 \text{ lb VOC}/1,000 \text{ gal})] + [(X + Y) * (0.108 \text{ lb VOC}/1,000 \text{ gal})] + [(XX + YY) * (0.00051 \text{ lb VOC}/1,000 \text{ gal})]}{2,000 \text{ lbs/ton}} = \text{Less than or equal to } 64.7 \text{ TPY VOC}$$

When the CEMS is in normal operation:

$$\frac{[(Y) * (0.167 \text{ lb VOC}/1,000 \text{ gal})] + [(YY) * (0.167 \text{ lb VOC}/1,000 \text{ gal})] + [(X + Y) * (0.108 \text{ lb VOC}/1,000 \text{ gal})] + [(XX + YY) * (0.00051 \text{ lb VOC}/1,000 \text{ gal})] + (Z \text{ lb VOC}/\text{yr})}{2,000 \text{ lbs/ton}} = \text{Less than or equal to } 64.7 \text{ TPY VOC}$$

Where:

- X = gasoline and transmix throughput at loading rack when utilizing VRU, gal/yr
- Y = gasoline and transmix throughput at loading rack when utilizing combustor, gal/yr
- XX = distillate throughput at loading rack when utilizing VRU, gal/yr
- YY = distillate throughput at loading rack when utilizing combustor, gal/yr
- Z = VOC Emissions measured by CEMS from gasoline, transmix, and distillate loading when utilizing VRU, lb/yr

- (2) The permittee shall operate the VRU in a manner not to exceed or go below (as appropriate) the operating parameter value established by the permittee during the performance tests of the CEMS, supplemented by engineering assessments and the manufacturer's recommendations.
- (3) The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:
 - a. all vapors displaced from the gasoline 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) A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (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 in 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.
- (9) The following vapor recovery unit parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the vapor recovery unit within these acceptable operating ranges when the CEMS is out of service or during a CEMS malfunction:
 - a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;
 - b. to ensure proper absorption by the absorption tower, the fuel supply temperature shall not exceed 98 degrees F;
 - c. to ensure a proper flow rate from the absorption tower to the carbon bed, a positive absorber pressure shall be maintained; and
 - d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 200 degrees F.

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

- (10) While utilizing the portable backup combustor control device, a pilot flame shall be maintained at all times in the combustor's pilot light burner.

- (11) The permittee shall comply with the applicable standards for volatile organic compound (VOC) emissions required under 40 CFR Part 60, Subpart XX, including the following sections:

502(a)	Subject facility shall be equipped with a vapor collection system.
502(b)	Organic compound limit from the vapor collection system.
502(c)	Emission limitation for existing vapor processing systems.
502(d)	Vapors collected from one loading rack are not permitted to pass through to another loading rack.
502(e)	Procedures for loading gasoline into vapor-tight tank trucks.
502(f)	Compatibility of vapor collection equipment with tank truck equipment.
502(g)	Procedures to ensure proper connection of vapor collection system.
502(h)	Gauge pressure requirements.
502(i)	Activation of pressure-vacuum vent.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the gasoline and transmix throughput rates, in gallons, for each month;
 - b. the distillate oil throughput rate, in gallons for each month;
 - c. the gasoline, transmix, and distillate throughput rate when utilizing the portable backup combustor control device, in gallons, for each month; itemized by fuel type;
 - d. the updated rolling, 12-month summation of the gasoline, transmix, and distillate oil throughput rates, in gallons; itemized by fuel type;
 - e. the updated rolling, 12-month summation of the gasoline, transmix, and distillate throughput rate when utilizing the portable backup combustor control device, in gallons; itemized by fuel type; and
 - f. the updated rolling, 12-month summation of the actual VOC emissions from the VRU, and the updated rolling, 12-month summation of the actual VOC emissions from the portable backup combustor control device in tons, for each month using the equation cited in c)(1). This shall include the information for the current month and the preceding eleven months.
- (2) The permittee shall comply with a preventive maintenance program (PMP) for the vapor recovery unit which has been approved by the Cleveland Division of Air Quality (CDAQ). The PMP shall include an annual inspection of the vapor recovery unit by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the CDAQ.

- (3) The permittee shall maintain the data required by the vapor recovery unit manufacturers' recommended daily operating guidelines when the CEMS is out of service or during CEMS malfunction. Any subsequent changes to the guidelines shall be mutually agreeable to the permittee and the CDAQ.
- (4) The permittee shall collect and record the following information for each day for the control equipment when the CEMS is out of service or during CEMS malfunction:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the gasoline supply temperature in degrees F;
 - d. the absorber pressure in psi; and
 - e. the carbon bed temperatures in degrees F.
- (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 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.
- (7) The permittee shall monitor the portable backup combustor control device when in use to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.
- (8) Prior to the installation of the continuous volatile organic compound (VOC) monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous VOC monitoring system meets the requirements of Performance Specification 8 or 9. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee also shall submit documentation supporting the proposed VOC detection method (flame ionization (FI), photoionization (PI), nondispersive infrared absorption (NDIR), gas chromatography (GC), or other detection principle) that is appropriate for the VOC species present in the emission gases and that meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9.

- (9) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous VOC monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9. The letter(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- (10) The permittee shall install, operate, and maintain equipment to continuously monitor and record VOC emissions from this emissions unit in units of the applicable standard(s), using the detection principle of the reference method specified in the regulation(s) or this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous VOC monitoring system for exhaust gases from the carbon adsorber/VRU including, but not limited to:

- a. emissions of VOCs in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
 - b. emissions of VOCs in units of the applicable standard(s) in the appropriate averaging period, as determined based on the operating parameter value established per Sections c)(2) and f)(3);
 - c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
 - d. results of required relative accuracy test audit(s), including results in units of the applicable standard(s) [see f)(4) below];
 - e. hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;
 - f. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;
 - g. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous VOC monitoring system; as well as,
 - h. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
- (11) The permittee shall record all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter values under Section c)(2).
- (12) Whenever a monitored operating parameter value deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the VOC concentration of the exhaust gases from the carbon adsorber/VRU immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (13) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart XX, including the following sections:

60.502(j)	Monthly inspection of vapor collection, processing, and loading rack system.
60.505(a)	Duration of vapor tightness documentation record retention.
60.505(b)	Updating gasoline tank truck documentation according to Method 27 requirements.
60.505(c)	Retention of monthly leak inspection records.
60.505(d)	Retention of notification documentation.
60.505(e)	Record keeping alternatives.
60.505(f)	Record keeping for replacements or additions of components.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. 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 rolling, 12-month limitations on the throughput of gasoline, transmix and distillates;
 - ii. any exceedance of the allowable rolling, 12-month throughput amounts while utilizing the portable backup combustor; and
 - iii. the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. 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) Any leaks in the vapor collection system or vapor control system 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 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the CDAQ with the submittal of the annual Permit Evaluation Report (PER). This report shall include the date the leak was detected and the date the leak was repaired.
- (3) 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.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous VOC monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland Division of Air Quality, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous VOC and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total VOC emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous VOC monitoring system while the emissions unit was in operation;
 - viii. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
 - ix. unless previously submitted, the results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliant results following any corrective actions;
 - x. the date, time, and duration of any/each malfunction** of the continuous VOC monitoring system, emissions unit, and/or control equipment;

- xi. the date, time, and duration of any downtime** of the continuous VOC monitoring system and/or control equipment while the emissions unit was in operation; and
- xii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(x) and (xi).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* Where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report.

** Each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit.

f) Testing Requirements

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

- a. Emission Limitations:
64.7 TPY of VOC from the loading of all refined petroleum products as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated through the recordkeeping requirements identified in d)(1) and the emission equation cited under c)(1).

Emission limitations when controlled by the VRU:

- b. Emission Limitation:
0.083 pound of VOC per 1,000 gallons of gasoline and transmix loaded.

Applicable Compliance Method:

Compliance shall be demonstrated through emission testing procedures identified in f)(2).

- c. Emission Limitation:
0.014 pound of VOC per 1,000 gallons of distillates loaded.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon multiplying the uncontrolled emission factor from AP-42, 5th Edition, Table 5.2-5 of 0.014 pound of VOC per 1,000 gallons of distillate by $(1 - 0.99)$ for the control efficiency of the VRU.

Emission limitations when controlled by portable backup combustor:

- d. Emission Limitation:
0.167 pound of VOC per 1,000 gallons of gasoline and transmix loaded.
- Applicable Compliance Method:
Compliance shall be demonstrated through emission testing procedures identified in f)(2).
- e. Emission Limitation:
0.167 pound of VOC per 1,000 gallons of distillates loaded.
- Applicable Compliance Method:
Compliance with this emission limitation may be based upon emission factors from AP-42, 5th Edition, Table 5.2-5 of 0.016 pound VOC per 1,000 gallons of diesel. Compliance shall be based on testing in f)(2).
- Emission limitations for fugitive tank truck emissions:
- f. Emission Limitation:
0.108 pound of VOC per 1,000 gallons as from tank truck fugitive losses when loading gasoline and transmix.
- Applicable Compliance Method:
The VOC emissions from gasoline tank trucks loading shall be determined using a vapor-tightness loss rate of 13 mg/l from the trucks.
- The 13 mg/l leakage emission factor was obtained from AP-42 Table 5.2-5.
- Alternatively, the VOC emission factor from gasoline and transmix loading shall be determined using AP-42, 5th Edition, Section 5.2 Equation (1).
- g. Emission Limitation:
0.00051 pound of VOC per 1,000 gallons as from tank truck fugitive losses when loading distillates.
- Applicable Compliance Method:
The VOC emissions from distillate tank trucks loading shall be determined using a vapor-tightness loss rate of 0.06 mg/l from the trucks.
- Alternatively, the VOC emission factor from distillates loading shall be determined using AP-42, 5th Edition, Section 5.2 Equation (1).
- (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 6 months prior to the permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s).

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- Method 2A of 40 CFR Part 60, Appendix A
Method 21 of 40 CFR Part 60, Appendix A
Method 25B of 40 CFR Part 60, Appendix A
Method 205 of 40 CFR Part 60, Appendix A
- Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity between the calendar months of May and September, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ).
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the CDAQ 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.
- 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 CDAQ within 30 days following 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 CDAQ.
- (3) The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible during each test run.)
- (4) Within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous VOC monitoring system pursuant to 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate); ORC section 3704.03(I); and using the VOC detection method that is appropriate for the VOC species present in the emission gases.

Recertification of the continuous VOC monitoring system (CEMS) shall take place following the same emissions testing cycle of the loading rack's VRU, which is six months prior to permit expiration.



Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous VOC monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 and ORC section 3704.03(I).

Ongoing compliance with the VOC emissions limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit.

- (5) For each performance test conducted, the permittee shall determine a monitored operating parameter value for the vapor processing system using the following procedure:
 - a. During the performance test, continuously record the applicable operating parameter(s);
 - b. Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations; and
 - c. Provide, for the Cleveland DAQ's approval, the rationale for the selected operating parameter value, and monitoring frequency and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standards in b).
- (6) For performance tests performed after the initial test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test.
- (7) The permittee shall comply with the applicable test methods and procedures required under 40 CFR Part 60, Subpart XX, including the following sections:

60.503(a)	Performance test requirements.
60.503(b)	Monitoring leakage prior to testing.
60.503(c)	Compliance determination with standards in 60.502(b) and (c).
60.503(d)	Compliance determination with the standards in 60.502(h).
60.503(e)	Demonstrating compliance while using a flare.
60.503(f)	Alternative test methods and procedures for flares.

g) Miscellaneous Requirements

- (1) This emissions unit was initially installed 6/1/1979 and modified after 12/17/1980.
- (2) The permittee shall comply with the applicable reconstruction requirements under 40 CFR Part 60, Subpart XX, including the following sections:

60.506(a)	Cost requirements.
60.506(b)	Fixed capital costs information.

- (3) VOC emission loading loss equation AP-42, 5th Edition, Equation 5.2-1:

$$L_L = 12.46 * (S * P * M) / T$$

where:

L_L = loading loss, pounds per 1,000 gallons (lb/10³ gal) of liquid loaded

S = a saturation factor (see Table 5.2-1)

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia) (see Section 7.1, "Organic Liquid Storage Tanks")

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see Section 7.1, "Organic Liquid Storage Tanks")

T = temperature of bulk liquid loaded, °R (°F + 460)



2. T001, Tank 55-3

Operations, Property and/or Equipment Description:

(55-3) 55,000 barrel (2,310,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-21-09(L)	See c), d), and e)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
- d. 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.

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

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

e) **Reporting Requirements**

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1959.
- (2) An internal floating roof was installed on this emission unit in 1982.
- (3) Installation of the internal floating roof in 1982 does not meet the definition of a modification as specified by 40 CFR Part 60 Subpart A.



3. T002, Tank 35-1

Operations, Property and/or Equipment Description:

(35-1) 35,000 barrel (1,470,000 gallon) fuel storage tank equipped with an internal floating roof, primary mechanical shoe, and secondary wiper seals.

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. 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.	OAC rule 3745-21-09(L)	See c), d), and e)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.



- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. 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.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.
- g) Miscellaneous Requirements
 - (1) None.

4. T003, Tank 35-9

Operations, Property and/or Equipment Description:

(35-9) 35,000 barrel (1,470,000 gallons) fixed roof fuel storage tank.

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. 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.	OAC rule 3745-21-09(L)(1)	See b)(2)a. below.
b.	OAC rule 3745-21-09(L)(3)	See d)(1) below.
c.	OAC rule 3745-21-09(L)(4)	See e)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

- (1) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1959.



5. T004, Tank 55-12

Operations, Property and/or Equipment Description:

(55-12) 55,000 barrel (2,310,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-21-07(K)(2)	See b)(2)a. below.
b.	OAC rule 3745-21-07(K)(4)	See b)(2)b. below.
c.	OAC rule 3745-21-09(L)	See c), d), and e)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall not place, store or hold any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with one of the following vapor loss control equipment:

i. The storage tank shall be equipped with a floating pontoon or double-deck type cover that includes closure seals to enclose any space between the cover's edge and the compartment wall.

This control requirement shall not be permitted if the liquid organic material in the tank has a vapor pressure of 12.5 pounds per square inch absolute or greater under actual storage conditions.

- ii. The storage tank shall be equipped with a vapor recovery system or control system that reduces the emission of organic compounds into the atmosphere by at least ninety per cent by weight.

All tank gauging or sampling devices shall be gas tight except when tank gauging or sampling is taking place.

- b. No person shall place, store or hold in any storage tank identified in paragraph (K)(3) of OAC rule 3745-21-07, any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with a permanent submerged fill pipe, or is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is fitted with a vapor recovery system as described in paragraph (K)(2)(b) of OAC rule 3745-21-07(K).

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1971.



6. T005, Tank 55-7

Operations, Property and/or Equipment Description:

(55-7) 55,000 barrel (2,310,000 gallons) fuel storage tank equipped with a vertical fixed roof (cone).

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. 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.	OAC rule 3745-21-09(L)(1)	See b)(2)a. below.
b.	OAC rule 3745-21-09(L)(3)	See d)(1) below.
c.	OAC rule 3745-21-09(L)(4)	See e)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

- (1) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1959.

7. T006, Tank 15-11

Operations, Property and/or Equipment Description:

(15-11) 15,000 barrel (630,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-31-05(A)(3)(c) (PTI 13-02469 issued 6/17/1992)	Volatile Organic Compound (VOC) emissions shall not exceed 1.80 pounds per hour and 2.25 TPY. See b)(2)a. below.
b.	OAC rule 3745-21-09(L)	See c), d)(1) and (2), and e)(1) below.
c.	40 CFR Part 60 Subpart Kb (40 CFR 60.110b – 117b) [In accordance with 40 CFR 60.110b, this emission unit is a storage vessel for petroleum liquids for which modification commenced after July 23, 1984 which is subject to the emissions limitations and/or	See Section b)(2)b. d)(3) and (4), e)(4), f)(2), and g)(1) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	control measures specified in this section.]	

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) to control VOC emissions from the unit has been determined to be a submerged filling system and internal floating roof with mechanical shoe seal.
- b. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(a)	Equipping the storage vessel with vapor control devices.
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c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.



- (3) The permittee shall comply with the monitoring required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.116b (a)	Copies of all records required by this section.
60.116b (b)	Records of the storage vessel's dimensions and capacity analysis.
60.116b (e)	Vapor pressure determination methods.

- (4) The permittee shall comply with the recordkeeping required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.115b (a)(2)	Records of inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4).
60.116b (c)	Maintain records of the VOL stored, period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (4) The permittee shall comply with the reporting requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.115b (a)(1)	Certification of control equipment meeting the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).
60.115b (a)(3)	Report submittal where conditions described in §60.113b(a)(2) have been detected.
60.115b (a)(4)	Detection of holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii).
60.116b (e)	Data used to determine the maximum true vapor pressure.



f) Testing Requirements

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

a. Emission Limitation:

Volatile Organic emissions shall not exceed 1.80 pounds per hour.
 Volatile Organic emissions shall not exceed 2.25 TPY.

Applicable Compliance Method:

VOC emissions from this storage tank shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.

(2) The permittee shall comply with the testing and procedures requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)	Inspection of control equipment meeting the requirements of §60.112b.
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g) Miscellaneous Requirements

(1) The permittee shall comply with the alternative means of emission limitation required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.114b	Notification of alternative means of emission limitation.
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(2) This emission unit was installed in 1959.

(3) This emission unit was equipped with an internal floating roof and submerged filling system in 1992. PTI #13-02469 was issued 6/17/1992 for this modification.



8. T007, Tank T-5

Operations, Property and/or Equipment Description:

(T-5) 885 barrel (37,170 gallons) fuel storage tank (fixed cone roof) equipped with an internal floating roof (covered floater) and primary mechanical shoe seal.

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. 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.	None.	None.

(2) Additional Terms and Conditions

a. There are no rules which are applicable to this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) This emission unit was installed in 1959.

(2) A PTI has never been issued for this emission unit.

(3) An internal floating roof was installed on this emission unit 9/2002.

(4) Installation of the internal floating roof in 2002 does not meet the definition of a modification as specified by 40 CFR Part 60 Subpart A.



9. T010, Tank 80-4

Operations, Property and/or Equipment Description:

(80-4) 80,000 barrel (3,360,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-21-09(L)	See c), d)(1) and (2), and e)(1) below.
b.	40 CFR Part 60 Subpart K (40 CFR 60.110-113) [In accordance with 40 CFR 60.110, this emission unit is a storage vessel for petroleum liquids for which construction commenced after June 11, 1973, and prior to May 19, 1978 which is subject to the emissions limitations and/or control measures specified in this section.]	See b)(2)a. and d)(3) below.



(2) Additional Terms and Conditions

- a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following sections:

60.112(a)(1)	Installation of vapor control devices based on vapor pressure.
60.112(a)(2)	Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

- a. The storage tank shall be equipped with an internal floating roof.
- b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
- d. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall comply with the applicable monitoring requirements under 40 CFR Part 60, Subpart K, including the following sections:

60.113(a)	Recordkeeping for the storage of petroleum.
60.113(b)	Reid vapor pressure and maximum storage temperature of stored product when used to determine maximum true vapor pressure, or any sampling results.

60.113(c)	Recording vapor pressure for crude oil.
60.113(d)	Exemptions.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1977.

10. T011, Tank 80-6

Operations, Property and/or Equipment Description:

(80-6) 80,000 barrel (3,360,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-21-09(L)	See c), d), and e)(1) below.
b.	40 CFR Part 60 Subpart K [In accordance with 40 CFR 60.110, this emission unit is a storage vessel for petroleum liquids for which construction commenced after June 11, 1973, and prior to May 19, 1978 which is subject to the emissions limitations and/or control measures specified in this section.]	See b)(2)a. and d)(3) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following section:



60.112(a)(1)	Installation of vapor control devices based on vapor pressure.
60.112(a)(2)	Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall comply with the applicable monitoring requirements under 40 CFR Part 60, Subpart K, including the following sections:

60.113(a)	Recordkeeping for the storage of petroleum.
60.113(b)	Reid vapor pressure and maximum storage temperature of stored product when used to determine maximum true vapor pressure, or any sampling results.
60.113(c)	Recording vapor pressure for crude oil.
60.113(d)	Exemptions.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1977.



11. T012, Tank 35-2

Operations, Property and/or Equipment Description:

(35-2) 35,000 barrel (1,470,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal.

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. 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.	OAC rule 3745-21-09(L)	See c), d), and e)(1) below.
b.	40 CFR Part 60 Subpart K [In accordance with 40 CFR 60.110, this emission unit is a storage vessel for petroleum liquids for which construction commenced after June 11, 1973, and prior to May 19, 1978 which is subject to the emissions limitations and/or control measures specified in this section.]	See b)(2)a. and d)(3) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following section:



60.112(a)(1)	Installation of vapor control devices based on vapor pressure.
60.112(a)(2)	Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall comply with the applicable monitoring requirements under 40 CFR Part 60, Subpart K, including the following sections:

60.113(a)	Recordkeeping for the storage of petroleum.
60.113(b)	Reid vapor pressure and maximum storage temperature of stored product when used to determine maximum true vapor pressure, or any sampling results.
60.113(c)	Recording vapor pressure for crude oil.
60.113(d)	Exemptions.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1976.

12. T018, Tank AA-10-2

Operations, Property and/or Equipment Description:

(AA-10-2) 10,000 gallon fuel storage tank equipped with a vertical (cone) fixed roof tank.

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. 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.	OAC rule 3745-31-05(A)(3)(c) PTI 13-02468 issued 4/15/1992	Volatile Organic Compound (VOC) emissions shall not exceed 2.30 pounds per hour and 0.75 tons per year (TPY). See b)(2)a. below.
b.	OAC rule 3745-21-07(K)(4)	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) to control VOC emissions from the unit has been determined to a submerged fill pipe.

b. No person shall place, store or hold in any storage tank identified in paragraph (K)(3) of this rule, any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with a permanent submerged fill pipe, or is loaded through the use of a portable loading tube which can be inserted below

the liquid level line during loading operations, or is fitted with a vapor recovery system as described in paragraph (K)(2)(b) of OAC rule 3745-21-07(K).

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- 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.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Volatile Organic emissions shall not exceed 2.30 pounds per hour.
Volatile Organic emissions shall not exceed 0.75 TPY.
 - Applicable Compliance Method:
VOC emissions from this storage tank shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.
- g) Miscellaneous Requirements
 - (1) This emission unit was installed in 1991.