



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

9/14/2016

Mr. Michael Michael
 BUCKEYE PIPE LINE CO- MANTUA STATION
 993 Brodhead Rd Suite 100
 Coraopolis, PA 15108

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1667050023
 Permit Number: P0121322
 Permit Type: Initial Installation
 County: Portage

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

and Akron Regional Air Quality Management District
 1867 West Market St.
 Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
 ARAQMD; Pennsylvania; West Virginia; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Buckeye Pipe Line intends to install 2 new above ground gasoline storage tanks (T013, T014) at its pipeline breakout station in Mantua Ohio and maintain its status as a minor source for VOC.

3. Facility Emissions and Attainment Status: This existing facility consists of seven above ground storage tanks. With the installation of two new tanks, the facility will have a potential to emit of VOC in excess of Title V permitting thresholds due to the potential emissions from unrestricted tank roof landings. Portage County is currently nonattainment for the 2008 eight-hour ozone standard.

4. Source Emissions: Buckeye will limit the number of tank roof landings for gasoline service from emissions units T012 – T014 to not exceed 54 per year. Buckeye will also limit the number of gasoline cleanouts from these tanks combined to 3. By accepting these limits, the combined annual emissions from T012 – T014 will not exceed 64.1 tons per year of VOC and the facility will continue to be a minor source VOC with a resultant facility PTE of 95.5 tons.

5. Conclusion: The terms and conditions in this permit will limit the facility's VOC emissions to less than Title V thresholds. Buckeye shall maintain records summarizing the facility's emissions, tank roof landings, and tank cleanouts. Excursion reports will be required to ensure compliance.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>64.1</u>

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation BUCKEYE PIPE LINE CO- MANTUA STATION

4911 EAST HIGH STREET,, MANTUA, OH 44255

ID#:P0121322

Date of Action: 9/14/2016

Permit Desc:Initial installation of two 4.2 million gallon above ground gasoline storage tanks with internal floating roofs and to establish FESOP limits on tanks T012 - T014 to avoid Title V permitting requirements at a pipeline breakout station..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Sean Vadas, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
BUCKEYE PIPE LINE CO- MANTUA STATION**

Facility ID:	1667050023
Permit Number:	P0121322
Permit Type:	Initial Installation
Issued:	9/14/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
BUCKEYE PIPE LINE CO- MANTUA STATION

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Draft Permit-to-Install and Operate
BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1667050023
Application Number(s): A0056402
Permit Number: P0121322
Permit Description: Initial installation of two 4.2 million gallon above ground gasoline storage tanks with internal floating roofs and to establish FESOP limits on tanks T012 - T014 to avoid Title V permitting requirements at a pipeline breakout station.
Permit Type: Initial Installation
Permit Fee: \$1,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/14/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

BUCKEYE PIPE LINE CO- MANTUA STATION
4911 EAST HIGH STREET
MANTUA, OH 44255

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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



Draft Permit-to-Install and Operate
 BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0121322

Permit Description: Initial installation of two 4.2 million gallon above ground gasoline storage tanks with internal floating roofs and to establish FESOP limits on tanks T012 - T014 to avoid Title V permitting requirements at a pipeline breakout station.

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

Group Name: Restricted Tanks

Emissions Unit ID:	T013
Company Equipment ID:	Tank 552
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	Tank 553
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

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 Akron Regional Air Quality Management District 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.



Draft Permit-to-Install and Operate
BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The permittee is advised that this facility may be subject to the “Generally Available Control Technology” (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart BBBBBB, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Draft Permit-to-Install and Operate
BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Restricted Tanks: T013,T014,

EU ID	Operations, Property and/or Equipment Description
T013	Tank 552 – 4.2 million gallon above ground gasoline storage tank with internal floating roof
T014	Tank 553 – 4.2 million gallon above ground gasoline storage tank with internal floating roof

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. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 4.66 tons per month averaged over a 12-month rolling period. (Emission limitation is for each individual emissions unit T013 and T014) See b)(2)a. below.
b.	OAC rule 3745-21-09(L)(1)	See b)(2)b. below.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c. below.
d.	OAC rule 3745-31-05(D)	Combined annual emissions from emission units T012 – T014 shall not exceed 64.1 tons per year of VOC, as a rolling, 12-month summation. Total maximum number of allowable roof landings for gasoline service from



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emission units T012 – T014 combined shall not exceed 54 per year, as a rolling, 12-month summation. Total maximum number of allowable gasoline tank cleanouts from emission units T012 – T014 combined shall not exceed 3 per year, as a rolling, 12-month summation. See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The VOC emission limitation for this emissions unit was established based on the summation of following activities:
 - i. Standing storage and working losses;
 - ii. Tank roof landings; and
 - iii. Tank cleanouts.

- b. The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - iii. 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.
 - iv. 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.

- c. The fixed roof in combination with an internal floating roof shall meet the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the

storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - (c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.



- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- d. The combined emissions of VOC from emission units T012 – T014 shall not exceed 64.1 tons per year, based upon a rolling, 12-month summation of the combined monthly emissions. The combined maximum number of allowable roof landings for gasoline service from emission units T012 – T014 shall not exceed 54 per year, as a rolling 12-month summation. The combined maximum number of allowable gasoline tank cleanouts from emission units T012 – T014 shall not exceed 3 per year, as a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels, allowable gasoline service roof landings, and gasoline tank cleanouts specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)	Maximum Allowable Roof Landings for Gasoline Service	Maximum Allowable Cumulative Gasoline Tank Cleanouts
1	21.0	18	1
1-2	21.0	18	1
1-3	21.0	18	1
1-4	21.0	18	1
1-5	42.0	36	2
1-6	42.0	36	2
1-7	42.0	36	2
1-8	42.0	36	2
1-9	64.1	54	3
1-10	64.1	54	3
1-11	64.1	54	3
1-12	64.1	54	3

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC and roof landing a tank cleanout limitations shall be based upon a rolling, 12-month summation of the monthly emissions and operational occurrences.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the calculated VOC emissions from the storage vessel; and at the end of 12 months of operation, the rolling 12-month

summation of VOC emissions and the average calculated over each rolling 12-month period.

VOC emissions shall be calculated based upon the methodology specified in section f)(1)a below.

- (2) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank;
 - b. the period of storage for each petroleum liquid; and
 - c. 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.

- (3) 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.
- (4) The permittee shall perform the following visual inspections:
 - a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
 - b. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Director (the appropriate Ohio EPA District Office or local air agency) in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
 - c. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):

- i. Visually inspect the vessel as specified in paragraph d)(4)d.of this section at least every 5 years; or
 - ii. Visually inspect the vessel as specified in paragraphd)(4)b.of this section.
 - d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs d)(4)b.and d)(4)c.ii. of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph d)(4)c.i.
- (5) The permittee shall maintain a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- (6) The owner or operator shall keep copies of all records required by 40 CFR 60, Subpart Kb, except for the record required by d)(7), for at least 2 years. The record required by d)(7) will be kept for the life of the source.
- (7) The permittee of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (8) The permittee shall maintain monthly records of the following information for the emission unit:
 - a. Tank throughput for each liquid stored, in gallons;
 - b. Number of roof landings in gasoline service; and
 - c. Number of gasoline tank cleanouts.
- (9) The permittee shall maintain monthly records of the following information for combined emission units T012 – T014:
 - a. the combined VOCemission rate for each month of operations;
 - b. combined number of tank roof landings in gasoline service;
 - c. combined number of gasoline tank cleanouts; and

- d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions, number of tank roof landings in gasoline service, and gasoline tank cleanouts.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative combined VOC emissions, number of tank roof landings in gasoline service, and gasoline tank cleanouts for each calendar month.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- (3) 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.
- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section d)(4) to afford the Director (the appropriate Ohio EPA District Office or local air agency) the opportunity to have an observer present. If the inspection required by section d)(4)d. of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Director (the appropriate Ohio EPA District Office or local air agency) at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is

received by the Director (the appropriate Ohio EPA District Office or local air agency) at least 7 days prior to the refilling.

- (5) The permittee shall submit a report to the Director (the appropriate Ohio EPA District Office or local air agency) that describes the control equipment and certifies that the control equipment meets 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).
- (6) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- (7) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made.
- (8) 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:

Combined annual emissions from emission units T012 – T014 shall not exceed 64.1 tons per year of VOC, as a rolling, 12-month summation.

Total maximum number of allowable roof landings for gasoline service from emission units T012 – T014 combined shall not exceed 54 per year, as a rolling, 12-month summation.

Total maximum number of allowable gasoline tank cleanouts from emission units T012 – T014 combined shall not exceed 3 per year, as a rolling, 12-month summation.

For the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels and roof landing and cleanout restrictions.
 - 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 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).

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 4.66 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

VOC emissions = \sum Standing storage and working losses + Tank roof landings + Tank cleanouts

Where:

Standing storage and working losses are calculated using the most recent version of USEPA's "Tanks Program" or AP-42 emission factors for standing storage and working loss calculations in section 7.1.

Tank roof landing emissions are calculated using the most recent version of USEPA's AP-42 emission factors in section 7.1.3.2.2.

Tank cleanout emissions are calculated using API Technical Report 2568 "Evaporative Loss from the Cleaning of a Storage Tank," November 2007.

Compliance with the tons per month averaged over a 12-month rolling period shall be determined following the first 12 months of operation.

b. Emission Limitation:

Combined annual emissions from emission units T012 – T014 shall not exceed 64.1 tons per year of VOC, as a rolling, 12-month summation.

Total maximum number of allowable roof landings for gasoline service from emission units T012 – T014 combined shall not exceed 54 per year, as a rolling, 12-month summation.



Draft Permit-to-Install and Operate
BUCKEYE PIPE LINE CO- MANTUA STATION
Permit Number: P0121322
Facility ID: 1667050023
Effective Date: To be entered upon final issuance

Total maximum number of allowable gasoline tank cleanouts from emission units T012 – T014 combined shall not exceed 3 per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements in section d)(9) above.

- g) Miscellaneous Requirements
 - (1) None.