



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

10/4/2016

Certified Mail

Mike Kolovich
 Buckeye Terminals, LLC - CANTON TERMINAL
 993 Brodhead Road Ste 100
 Moon Township, PA 15108

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

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

Facility ID: 1576050275
 Permit Number: P0120822
 Permit Type: OAC Chapter 3745-31 Modification
 County: Stark

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 Canton Repository. 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 and Canton City Health Department
 Permit Review/Development Section 420 Market Avenue
 Ohio EPA, DAPC Canton, OH 44702-1544
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

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 Canton City Health Department at (330)489-3385.

Sincerely,

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

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

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 OAC Chapter 3745-31 Modification
Buckeye Terminals, LLC - CANTON TERMINAL

807 HARTFORD AVE., Canton, OH 44707

ID#:P0120822

Date of Action: 10/4/2016

Permit Desc: Chapter 31 modification permit to add the use of a portable vapor control unit as an alternate control device for the loading rack while the permanent vapor control device (vapor recovery unit) is undergoing planned or emergency downtime. This permit also establishes a voluntary restriction to reduce the allowable VOC emissions from loading operations..

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: Marisa Toppi, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544. Ph: (330)489-3385

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Buckeye Terminals, LLC – Canton Terminal is a bulk gasoline terminal located in Canton, OH. Operations at the facility include one loading rack and numerous storage tanks. Emissions from the loading rack are controlled and vented to a carbon adsorption vapor recovery unit (VRU) or a portable vapor combustion unit (VCU). The VCU is used as an alternate control device for the loading rack when the VRU is undergoing planned or emergency downtime.

3. Facility Emissions and Attainment Status:

Buckeye Terminals is located in Stark County which is designated as attainment for all criteria pollutants.

The facility has a federally enforceable limitation of loading 239,000,000 gallons of gasoline and 300,000,000 gallons of distillate per year.

4. Source Emissions:

Physical changes occurring at the facility include the installation of the VCU as an alternate control device. Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate matter with an aerodynamic diameter of less than or equal to 10 microns in diameter (PM₁₀), and Sulfur Dioxide (SO₂) emissions are generated when the VCU is operated. However, the annual emissions of Volatile Organic Compound (VOC) emissions are not increasing.

5. Conclusion:

With the federally enforceable synthetic minor restrictions in place, the facility will not trigger the thresholds for Title V or MACT applicability.

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>
VOC	75.65
CO	20.07
NO _x	8.04
PM	0.48
SO ₂	0.27



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals, LLC - CANTON TERMINAL**

Facility ID:	1576050275
Permit Number:	P0120822
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/4/2016
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 Terminals, LLC - CANTON TERMINAL

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
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"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. J001, Loading Rack	11



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576050275
Application Number(s): A0056045
Permit Number: P0120822
Permit Description: Chapter 31 modification permit to add the use of a portable vapor control unit as an alternate control device for the loading rack while the permanent vapor control device (vapor recovery unit) is undergoing planned or emergency downtime. This permit also establishes a voluntary restriction to reduce the allowable VOC emissions from loading operations.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/4/2016
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 Terminals, LLC - CANTON TERMINAL
807 HARTFORD AVE
Canton, OH 44707

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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 Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120822

Permit Description: Chapter 31 modification permit to add the use of a portable vapor control unit as an alternate control device for the loading rack while the permanent vapor control device (vapor recovery unit) is undergoing planned or emergency downtime. This permit also establishes a voluntary restriction to reduce the allowable VOC emissions from loading operations.

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 Rack
Superseded Permit Number:	P0101199
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
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 Canton City Health Department 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 Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
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, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for 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 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 the Canton City Health Department, Air Pollution Control Division.
3. 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.



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Truck Loading Rack used to load gasoline, distillate, and/or other additives/dyes. Emissions are controlled and vented to a carbon adsorption/gasoline adsorption vapor recovery unit (VRU) that has a minimum control efficiency of 93.9% or a backup portable vapor combustion unit (VCU). The loading rack consists of 6 loading bays. The fugitive emissions associated with components leaking at this emissions unit (i.e., valves, flanges, open ended lines, and pumps) are included in the separate facility-wide emissions unit, P003.

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. b)(1)d., b)(2)c., and f)(1)g. – f)(1)i.

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

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

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]	<u>Volatile organic compound (VOC) emissions from gasoline loading shall not exceed:</u> 0.50 pound (lb) of VOC per 1,000 gallons (gals) [60 milligrams per liter (mg/L)] of gasoline loaded into the delivery vessel and 59.84 tons per year (tons/yr) from stack emissions and 12.96 tons/yr from fugitive emissions <u>VOC emissions from distillate loading shall not exceed:</u>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.19 lb of VOC per 1,000 gals of distillate loaded into the delivery vessel and 2.85 tons/yr from stack emissions Total annual VOC emissions from this emissions unit shall not exceed 75.65 tons/yr (stack and fugitive emissions combined) See b)(2)a. and c)(1)
b.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3) [Best Available Technology (BAT) for sources greater than 10 tons/yr]	Best Available Technology for VOC emissions is equivalent to the limitations established under OAC rule 3745-21-09(Q) Carbon monoxide (CO) emissions shall not exceed 1.67 tons per month averaged over a 12-month rolling period See b)(2)d. through b)(2)f., and c)(9) through c)(10)
c.	OAC rule 3745-31-05(A)(3), as effective 06/30/2008 [BAT for sources less than 10 tons/yr]	Nitrogen oxides (NO _x) emissions shall not exceed 0.67 tons per month averaged over a 12-month rolling period Particulate matter with an aerodynamic diameter of less than or equal to 10 microns in diameter (PM ₁₀) shall not exceed 0.04 tons per month averaged over a 12-month rolling period Sulfur dioxide (SO ₂) emissions shall not exceed 0.02 tons per month averaged over a 12-month rolling period See b)(2)b. and b)(2)d. through b)(2)f., and c)(9) through c)(10)
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008 [Less than 10 tons/yr BAT exemption]	See b)(2)c.
e.	OAC rule 3745-21-09(Q)	See b)(2)g. and c)(2) through (7)
f.	40 CFR part 60, subpart XX	Exempt



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 60.500 – 60.506)	See b)(2)h.
g.	40 CFR part 63, subpart R (40 CFR 63.420 – 429)	Exempt See b)(2)i.

(2) Additional Terms and Conditions

- a. This permit establishes the following terms and conditions for the purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The federally enforceable restrictions are being established for purposes of avoiding Title V and MACT permitting requirements:
 - i. the maximum annual throughput of gasoline (gasoline and other additives) shall not exceed 239,000,000 gallons per rolling, 12-month period; and
 - ii. the maximum annual throughput of distillate (diesel fuels, fuel oils, kerosene, and other dyes/additives) shall not exceed 300,000,000 gallons per rolling, 12-month period.
- b. The Best Available Technology (BAT) emission limit applies until the U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of Ohio's State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of Ohio's SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the Nitrogen Oxides (NO_x), Particulate Matter less than 10 microns in diameter (PM₁₀), and Sulfur Dioxide (SO₂) emissions from this air contaminant source since the potential to emit is less than 10 tons/yr taking into account the federally enforceable restriction pursuant to OAC rule 3745-31-05(D) in term b)(1)a.
- d. All gasoline and distillate loading shall be controlled by a Vapor Recovery Unit (VRU) or other such device (portable Vapor Combustion Unit (VCU)) capable of achieving the allowable emissions limitations required by this permit when the VRU is undergoing planned or emergency downtime.
- e. The permittee shall comply with the emissions limitations for Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate Matter less than 10 microns in diameter (PM₁₀), and Sulfur Dioxide (SO₂) only when using the backup portable VCU as a means of controlling VOC emissions from this emissions unit. All filterable and

condensable particulate matter shall be considered PM₁₀ for purposes of demonstrating compliance with these emissions limitations.

- f. The CO, NO_x, PM₁₀, and SO₂ emission limits were established to reflect the potential to emit for this emissions unit taking into consideration the throughput limitations established under OAC rule 3745-31-05(D). Therefore, the monitoring, recordkeeping, and reporting requirements for the throughput limitations as established in the following terms and conditions are sufficient to ensure compliance with these terms.
- g. The emission limitation that VOC emissions shall not exceed 0.67 lb VOC per 1,000 gals (80 mg/L) of gasoline loaded into the delivery vessel, as specified in OAC rule 3745-21-09(Q), is less stringent than the federally-enforceable emission limitation of 0.5 lb VOC/1,000 gals (60 mg/L) of gasoline loaded into the delivery vessel established in this permit for VOC pursuant to OAC rule 3745-31-05(D).
- h. In accordance with 40 CFR 60.500(b), the requirements of 40 CFR part 60, subpart XX do not apply to this emissions unit because construction or modification commenced before December 17, 1980.
- i. In accordance with 40 CFR 63.420(d), the requirements of 40 CFR part 63, subpart R do not apply to this facility because the results, E_T or E_p, of the calculation provided in 40 CFR 63.420(a)(1) or (b)(1) is less than 0.50.

c) Operational Restrictions

- (1) The annual throughput of gasoline and distillate shall not exceed the following:
 - a. the maximum annual throughput of gasoline (gasoline and other additives) shall not exceed 239,000,000 gallons per rolling, 12-month period; and
 - b. the maximum annual throughput of distillate (diesel fuels, fuel oils, kerosene, and other dyes/additives) shall not exceed 300,000,000 gallons per rolling, 12-month period.
- (2) 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 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.
- (3) The loading rack is 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.
 - (4) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
 - (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (6) 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.
 - (7) 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% of the lower explosive limit (LEL) as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
 - (8) The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 3% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation in term b)(1)a. (60 mg/L), but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.] Monitoring shall be conducted as detailed in term d)(2) and only if a Continuous Emission Monitoring System (CEMS) has not been installed and certified, or is not operational.
 - (9) When emissions are vented to the vapor combustion unit for control, the pilot flame of the vapor combustion unit shall be maintained at all times during the loading of gasoline (including gasoline and gasoline additives) or distillates (i.e. diesel or diesel additives).
 - (10) The vapor recovery system shall be kept in good working order and shall be used at all times during the transfer of gasoline or distillates (i.e. jet fuel, kerosene, diesel fuel, heating oil, or fuel oil) into gasoline tank trucks (as defined by 40 CFR 60.501). Transfer of gasoline or distillate into gasoline tank trucks without vapor controls is prohibited. Approval to load without vapor controls during malfunction or scheduled maintenance of controls is prohibited. Approval to load without vapor controls during malfunction or schedules maintenance of the vapor recovery system will require prior approval of the Ohio EPA in accordance with OAC rule 3745-15-06, "Malfunction of Equipment; Scheduled Maintenance; Reporting."
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the following information:
 - a. the company identification of each petroleum liquid loaded;
 - b. the total throughput of gasoline for each month, in gallons;

- c. the total throughput of distillates for each month, in gallons;
 - d. the rolling, 12-month summation of the monthly throughputs of gasoline, in gallons; and
 - e. the rolling, 12-month summation of the monthly throughputs of distillates, in gallons.
- (2) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines with limitations established in term c)(8). The highest VOC concentration, as measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit and any triggered actions taken.

Once a VOC Continuous Emission Monitoring System (CEMS) is installed, certified, and operating in accordance with the quality assurance/quality control plan specified in term d)(3)a., the permittee is no longer required to monitor the VOC exhaust gas concentration on a monthly basis because VOC emissions shall be monitored and recorded on a continuous basis. In an event that the CEMS becomes non-operational, monitoring shall revert to Method 21 monitoring procedure for the period that the CEMS is non-operational.

- (3) If the permittee seeks to demonstrate compliance with term b)(1)a. through the use of a Continuous Emission Monitoring System (CEMS), the permittee shall satisfy the following requirements:
- 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. At least 45 days before commencing certification testing of the continuous VOC monitoring system, the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of VOC emissions from the continuous monitor, in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous VOC monitoring system must be kept on-site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR part 60, and to conduct relative accuracy test audits in units of the standard(s) in accordance with and at the frequencies required per 40 CFR part 60.
 - 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 recordings/processing hardware and software.

- (4) Prior to the installation of the continuous 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 Canton City Health Department, Air Pollution Control Division upon request.

The permittee shall also 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.

- (5) If a CEMS is employed, 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) of 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 including, but not limited to:

- a. emissions of VOC in parts per million (ppm) for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of VOC in units of the applicable standard(s) in the appropriate averaging period;
- c. results of the quarterly cylinder gas audits;
- d. results of daily zero-span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;
- h. 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,

- i. the reason (if known) and the corrective actions taken (if any) for each such event in term d)(5)g. and h.

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

- (6) 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).
- (7) The permittee shall perform monthly monitoring of all potential sources of vapor leaks from the terminal's vapor collection system and vapor control system while a gasoline tank truck is being loaded. Where vapor leaks are determined to be equal to or greater than 100% of the lower explosive limit (LEL) as propane, as determined under paragraph (K) of OAC rule 3745-21-10, the permittee shall maintain a record of the following information:
 - a. The date the leak was detected;
 - b. The findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;
 - c. The leak detection method;
 - d. The corrective action(s) taken to repair each leak and the date of final repair;
 - e. The reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than the 100% of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and
 - f. The inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

- (8) When emissions are vented to the vapor combustion unit for control, the permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. Each manned business day, the operator shall verify that the pilot flame and flame sensor are working during loading operations. The permittee shall operate and maintain the fail-safe system that immediately shuts down loading if the pilot flame does not ignite.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Canton City Health Department, Air Pollution Control Division, by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) 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 pollution and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:

- i. The rolling, 12-month throughput restrictions on gasoline and distillate;
- ii. All exceedances of the 0.50 lb VOC/1,000 gals loaded from the vapor control system;
- iii. All periods of time during which the emissions were vented to the vapor combustion unit (VCU) for control, and the pilot flame was not functioning properly or the flare was not maintained as required in this permit;
- iv. Any exceedance of the exhaust gas vapor concentration from the carbon adsorption vessels; and
- v. All deviations (excursions) of the operational restrictions in terms c)(2) through c)(6) and terms c)(9) – (10) about vapor recovery system, loading racks, gasoline loading lines and vapor lines, spill discard into sewer open containers, and leak from vapor collection system.

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 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 Canton City Health Department, Air Pollution Control Division.

(3) Any leaks in the vapor collection system or vapor control system equal to or greater than 100% 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 Canton City Health Department, Air Pollution

Control Division within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

- (4) If a CEMS is employed, 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, recordkeeping, 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 Canton City Health Department, Air Pollution Control Division, 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 following:
 - i. The date of the exceedance;
 - ii. The commencement and completion times of the exceedance;
 - iii. The duration and magnitude of each exceedance; as well as,
 - iv. 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 31, April 30, July 31, and October 31 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, in tons;
 - vi. The total operating time of the emissions unit, in hours;
 - vii. The total operating time of the continuous VOC monitoring system while the emissions unit was in operation, in hours;
 - viii. Results and dates of quarterly cylinder gas audits;



- ix. 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));
- x. Unless previously submitted, results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliance results following any corrective actions;
- xi. The date, time and duration of any/each malfunction** of the continuous VOC monitoring system, emissions unit, and/or control equipment;
- xii. 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
- xiii. The reason (if known) and the corrective actions taken (if any) for each even in term e)(1)b.xi. and xii.

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 has not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

**each downtime and malfunction even 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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.50 lb VOC/1,000 gals of gasoline loaded from the stack

Applicable Compliance Method:

Compliance with the lb VOC/1,000 gals gasoline loaded emission limitation shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10(E).

If the permittee seeks to demonstrate compliance with the lb VOC/1,000 gals gasoline loaded emission limitation through the use of a CEMS, compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in term d)(5).



b. Emission Limitation:

59.84 tons VOC/year from gasoline loading from the stack

12.96 tons VOC/year from gasoline fugitive emissions

Applicable Compliance Method:

Compliance with this annual limit shall be assumed provided compliance with the lb VOC/1,000 gal limitation from term b)(1)a. and material throughputs from term c)(1) are achieved.

i. The stack tons/yr VOC emission limitation was established using the following calculation:

$$\begin{aligned}
 & \frac{60 \text{ mg VOC}}{1 \text{ L}} * \frac{3.79 \text{ L}}{1 \text{ gal}} * \frac{1 \text{ lb}}{453,592 \text{ mg}} * \frac{239,000,000 \text{ gals gasoline}}{1 \text{ yr}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} \\
 & = 59.84 \frac{\text{tons}}{\text{yr}} \text{ VOC}
 \end{aligned}$$

Where:

$\frac{60 \text{ mg VOC}}{1 \text{ L}}$	=	VOC emission rate, mg VOC/1 L gasoline loaded. This emission rate is equivalent to 0.5 lb VOC/1,000 gal
$\frac{239,000,000 \text{ gals gasoline}}{1 \text{ yr}}$	=	annual gasoline throughput limitation from term c)(1), gals/yr
$\frac{3.79 \text{ L}}{1 \text{ gal}}$	=	conversion factor
$\frac{1 \text{ lb}}{453,592 \text{ mg}}$	=	conversion factor
$\frac{1 \text{ ton}}{2,000 \text{ lbs}}$	=	conversion factor

The actual annual emissions shall be calculated by multiplying the VOC emission rate from the most recent emission test (in lbs VOC/1,000 gals gasoline loaded) times the gallons of gasoline loaded per year and dividing by 2,000 lbs/ton.

ii. The fugitive VOC emissions from loading truck cargo tanks were established using the following calculation:

$$\begin{aligned}
 & \frac{13 \text{ mg}}{1 \text{ L}} * \frac{3.79 \text{ L}}{1 \text{ gal}} * \frac{1 \text{ lb}}{453,592 \text{ mg}} * \frac{239,000,000 \text{ gals gasoline}}{1 \text{ yr}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} \\
 & = 12.96 \frac{\text{tons}}{\text{yr}} \text{ VOC}
 \end{aligned}$$



Where:

$$\frac{13 \text{ mg}}{1 \text{ L}} = \text{VOC emission rate from loading truck cargo tanks per Appendix A of U.S. EPA's Gasoline Distribution Industry (Stage I) – Background Information for Promulgated Standards (11/94), mg VOC/1 L gasoline loaded}$$

c. Emission Limitation:

0.019 lb VOC/1,000 gals of distillate loaded from the stack

Applicable Compliance Method:

Compliance with the lb VOC/1,000 gals distillate loaded emission limitation shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10(E).

If the permittee seeks to demonstrate compliance with the lb VOC/1,000 gals distillate loaded emission limitation through the use of a CEMS, compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in term d)(5).

d. Emission Limitation:

2.85 tons VOC/yr from distillate loading from the stack

Applicable Compliance Method:

Compliance with this annual limit shall be assumed provided compliance with the lb VOC/1,000 gal limitation from term b)(1)a. and material throughputs from term c)(1) are achieved.

The tons/yr VOC emission limitation was established using the following calculation:

$$\frac{0.019 \text{ lb VOC}}{1,000 \text{ gals distillate}} * \frac{300,000,000 \text{ gals distillate}}{1 \text{ yr}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} = \frac{2.85 \text{ tons}}{\text{yr}} \text{ VOC}$$

Where:

$$\frac{0.019 \text{ lb VOC}}{1,000 \text{ gals}} = \text{VOC emission rate, lb VOC/1,000 gals distillate loaded}$$

$$\frac{300,000,000 \text{ gals gasoline}}{\text{yr}} = \text{annual distillate throughput limitation from term c)(2), gals/yr}$$

The actual annual emissions shall be calculated by multiplying the VOC emissions rate from the most recent emission test (in lbs VOC/1,000 gals distillate loaded) times the gallons of distillate loaded per year and dividing by 2,000 lbs/ton.



e. Emission Limitation:

75.65 tons VOC/yr total stack and fugitive emissions combined

Applicable Compliance Method:

Compliance with this annual limit shall be assumed provided compliance with the lb VOC/1,000 gal limitations from term b)(1)a. and material throughputs from term c)(1) are achieved.

This emission limit was established by taking the sum of the individual annual stack and fugitive limitations for gasoline and distillate loading listed in term b)(1)a.

f. Emission Limitation:

1.67 tons CO/month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the CO monthly limit shall be assumed provided compliance with the material throughputs from term c)(1) are achieved.

The tons/month CO emission limitation was established using the following calculation:

$$\begin{aligned}
 &\frac{539,000,000 \text{ gals}}{1 \text{ yr}} * \frac{5 \text{ lbs vapor}}{1,000 \text{ gallons liquid}} * \frac{1 \text{ gal}}{5.6 \text{ lb}} * \frac{0.0834 \text{ lb}}{1 \text{ gal}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} \\
 &\quad * \frac{1 \text{ yr}}{12 \text{ months}} = 1.67 \frac{\text{tons}}{\text{month}} \text{ CO}
 \end{aligned}$$

Where:

$$\frac{539,000,000 \text{ gals}}{1 \text{ yr}} = \text{Total liquid loaded based on the permitted annual petroleum throughput } \left(239,000,000 \frac{\text{gals}}{\text{yr}} \text{ gasoline} + 300,000,000 \text{ gals yr distillate} = 539,000,000 \text{ gals yr, gals/yr} \right)$$

$$\frac{5 \text{ lbs vapor}}{1,000 \text{ gallons liquid}} = \text{Uncontrolled emission factor for submerged loading – dedicated normal service per AP-42 Chapter 5.2: Transportation and Marketing of Petroleum Liquids, Table 5.2-5 [07/08], gals/yr}$$

$$\frac{5.6 \text{ lb}}{1 \text{ gal}} = \text{Density of gasoline per AP-42 Chapter 7.1: Organic Liquid Storage Tanks, Table 7.1-2 [11/06], lb/gal}$$

$$\frac{0.0834 \text{ lb}}{1 \text{ gal}} = \text{Emission factor for fuel oil combustion per VCU Manufacturer John Zink, lb/gal}$$



The CO emission factor may also be taken from AP-42 Chapter 1.3: Fuel Oil Combustion, Table 1.3-1 [05/10]. The higher emission factor of the two sources was used per Application #A0056045 to be conservative.

g. Emission Limitation:

0.67 tons NO_x/month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the NO_x monthly limit shall be assumed provided compliance with the material throughputs from term c)(1) are achieved.

The tons/month NO_x emission limitation was established using the following calculation:

$$\begin{aligned}
 & \frac{539,000,000 \text{ gals}}{1 \text{ yr}} * \frac{5 \text{ lbs vapor}}{1,000 \text{ gallons liquid}} * \frac{1 \text{ gal}}{5.6 \text{ lb}} * \frac{0.0334 \text{ lb}}{1 \text{ gal}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} \\
 & * \frac{1 \text{ yr}}{12 \text{ months}} = 0.67 \frac{\text{tons}}{\text{month}} \text{ NO}_x
 \end{aligned}$$

Where:

$$\frac{0.0334 \text{ lb}}{1 \text{ gal}} = \text{Emission factor for fuel oil combustion per VCU Manufacturer John Zink, lb/gal}$$

The NO_x emission factor may also be taken from AP-42 Chapter 1.3: Fuel Oil Combustion, Table 1.3-1 [05/10]. The higher emission factor of the two sources was used per Application #A0056045 to be conservative.

h. Emission Limitation:

0.04 tons PM₁₀/month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the PM₁₀ monthly limit shall be assumed provided compliance with the material throughputs from term c)(1) are achieved.

The tons/month PM₁₀ emission limitation was established using the following calculation:

$$\begin{aligned}
 & \frac{539,000,000 \text{ gals}}{1 \text{ yr}} * \frac{5 \text{ lbs vapor}}{1,000 \text{ gallons liquid}} * \frac{1 \text{ gal}}{5.6 \text{ lb}} * \frac{0.0020 \text{ lb}}{1 \text{ gal}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} \\
 & * \frac{1 \text{ yr}}{12 \text{ months}} = 0.04 \frac{\text{tons}}{\text{month}} \text{ PM}_{10}
 \end{aligned}$$



Where:

$$\frac{0.0020 \text{ lb}}{1 \text{ gal}} = \text{Emission factor for fuel oil combustion per AP-42 Chapter 1.3: Fuel Oil Combustion, Table 1.3-1 [05/10], lb/gal}$$

The NO_x emission factor may also be taken from VCU Manufacturer John Zink. The higher emission factor of the two sources was used per Application #A0056045 to be conservative.

i. Emission Limitation:

0.02 tons SO₂/month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the SO₂ monthly limit shall be assumed provided compliance with the material throughputs from term c)(1) are achieved.

The tons/month SO₂ emission limitation was established using the following calculation:

$$\frac{539,000,000 \text{ gals}}{1 \text{ yr}} * \frac{5 \text{ lbs vapor}}{1,000 \text{ gallons liquid}} * \frac{1 \text{ gal}}{5.6 \text{ lb}} * \frac{0.001136 \text{ lb}}{1 \text{ gal}} * \frac{1 \text{ ton}}{2,000 \text{ lbs}} * \frac{1 \text{ yr}}{12 \text{ months}} = 0.04 \frac{\text{tons}}{\text{month}} \text{ PM}_{10}$$

Where:

$$\frac{0.001136 \text{ lb}}{1 \text{ gal}} = \text{Emission factor for fuel oil combustion per AP-42 Chapter 1.3: Fuel Oil Combustion, Table 1.3-1 [05/10], lb/gal}$$

The SO₂ emission factor may also be taken from VCU Manufacturer John Zink. The higher emission factor of the two sources was used per Application #A0056045 to be conservative.

- (2) Within twelve months before permit renewal the permittee shall conduct an emission test for this emissions unit in order to demonstrate continuing compliance with the allowable VOC emission rate. This test shall be conducted between the month of May and September.

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 80,000 gallons (302,833 liters) of gasoline are loaded. However, the test should be conducted at the maximum throughput possible, as determined per the following:

- a. During the emission testing, the emissions unit shall be operated under operational conditions approved in advance by the Canton City Health Department, Air Pollution Control Division. Operational conditions that may need



to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under “worst case” conditions expected during the life of the permit. As part of the information provided in the “Intent to Test” notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emission testing and describe why they believe “worst case” operating conditions will be met. Prior to conducting test(s), the permittee shall confirm with the Canton City Health Department, Air Pollution Control Division that the proposed operating conditions constitute “worst case”. Failure to test under the approved conditions may result in the Canton City Health Department, Air Pollution Control Division not accepting the test results as a demonstration of compliance.

Note: This test is required even if a CEMS is operating at the time.

- (3) If a CEMS is employed, the permittee shall conduct certification tests of the continuous VOC monitoring system no later than 180 days after initial startup 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.

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 collection as required in the Monitoring and Recordkeeping section of this permit, and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR part 60.

- (4) Not later than 30 days prior to any proposed test date(s), the permittee shall submit an “Intent to Test” notification to the Canton City Health Department, Air Pollution Control Division. The “Intent to Test” notification shall describe the following in detail:
 - a. The proposed test methods and procedures;
 - b. The emissions unit’s operating parameters;
 - c. The time(s) and date(s) of the test(s); and
 - d. 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 Canton City Health Department, Air Pollution Control Division’s refusal to accept the results of the emission test(s).



Draft Permit-to-Install and Operate
Buckeye Terminals, LLC - CANTON TERMINAL
Permit Number: P0120822
Facility ID: 1576050275
Effective Date: To be entered upon final issuance

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person(s) responsible for the test(s) and submitted to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s) pursuant to OAC rule 3745-15-04.

- g) Miscellaneous Requirements
 - (1) None.