



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

11/2/2016

Kim Trostel
 Buckeye Terminals LLC - Columbus South Terminal
 940 Buckeye Rd.
 Lima, OH 45804

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0125040239
 Permit Number: P0120898
 Permit Type: Administrative Modification
 County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
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 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 Columbus Dispatch. 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
 P.O. Box 1049
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
 50 West Town Street, 6th Floor
 P.O. Box 1049
 Columbus, OH 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 in writing 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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 Ohio EPA-CDO

Permit Strategy Write-Up

1. Source Description:

Buckeye Terminals LLC – Columbus South Terminal (Buckeye South) is increasing their facility-wide throughput of gasoline from 319,000,000 to 638,000,000 gallons per rolling, 12-month period and distillate from 300,000,000 to 600,000,000 gallons per rolling, 12-month period. This increase will move them into Title V applicability and they have submitted an application to make this change in the installation permits for T007, T008, T017, and T020, all of which are storage tanks. T007 and T020 are equipped with external fixed roofs and internal floating roofs and T008 and T017 are equipped with domed external floating roofs. Domed external floating roof tanks (DEFRT) are closer in function to internal floating roof tanks (IFRT) than they are to external floating roof tanks (EFRT), and will therefore continue to be treated as IFRTs in this permit. These units are transitioning from FEPTIO permits to PTI permits as the facility transitions to Title V classification. The facility will remain synthetic minor for MACT applicability. This permit incorporates the new throughput limits and the associated new emissions limits.

2. Facility Emissions and Attainment Status:

The facility is located in Franklin County which is currently in marginal non-attainment status for the 2008 8-hour ozone standard. This change is not defined as a “modification” under OAC rule 3745-31(01)(SSS)(1)(a)(v) (i.e. it is an administrative modification) because the source has always been capable of accommodating the increased throughput and is not expressly prohibited from increasing the throughput under any permit condition of applicable requirement of the Clean Air Act (per Mike Hopkins). Therefore, it does not trigger non-attainment New Source Review (NSR) requirements. The potential emissions from the facility are increasing from 90.9 tons of VOC per year to 160.42 tons of VOC per year, taking into account the throughput limitations. The facility-wide individual and combined HAPs limits are remaining 9.9 tons per year and 24.9 tons per year, respectively, to avoid MACT subjectivity. The facility will be a Title V source for VOC emissions, but not HAP emissions. Ohio EPA has identified that the facility is subject to the Generally Available Control Technology NESHAP (GACT) BBBBBB, but the authority to enforce this standard remains with U.S. EPA.

3. Source Emissions:

T007, T008, T017, and T020 are all subject to 40 CFR part 60 subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

T007 and T020 are fixed roof tanks and are subject to OAC rule 3745-21-09(L). T008 and T017 are domed external floating roof tanks and are also subject to OAC rule 3745-21-09(L).

BAT for T007, T008, and T020 was established as a tpy VOC limit that corresponded to the gallon throughput limits, and compliance with the requirements of 40 CFR part 60 subpart Kb. BAT for T017 was established as only a tpy VOC limit that corresponded to the gallon throughput limits. T017 is also subject to 40 CFR part 60 subpart Kb, but compliance with that subpart was not included as part of BAT. The BAT tpy limits are increasing to match the increased throughput limits, but the BAT strategy will not change.



The BAT limits for T007, T008, T017, and T020 were calculated by the facility using a program similar to U.S. EPA's Tanks program. They include stack emissions, fugitive emissions, emissions due to tank cleanings, and emissions due to roof landings.

4. Conclusion:

The issuance of permit P0120898 is recommended.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	160.42
Individual HAP	9.9
Combined HAPs	24.9

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 Administrative Modification

Buckeye Terminals LLC - Columbus South Terminal

303 WILSON ROAD,, Columbus, OH 43204

ID#:P0120898

Date of Action: 11/2/2016

Permit Desc: This permit to install is to allow a facility-wide increase in the throughput of gasoline and distillate which will increase VOC emissions to above the Title V threshold of 100 tpy. Only 4 units at the facility are subject to OAC rule 3745 chapter 31, which requires units to have an installation permit..

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: Alexandria Fair, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

**Division of Air Pollution Control
Permit-to-Install**

for

Buckeye Terminals LLC - Columbus South Terminal

Facility ID:	0125040239
Permit Number:	P0120898
Permit Type:	Administrative Modification
Issued:	11/2/2016
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Buckeye Terminals LLC - Columbus South Terminal

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Draft Permit-to-Install
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0120898
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040239
Facility Description: Bulk Gasoline Loading Terminal
Application Number(s): A0056054
Permit Number: P0120898
Permit Description: This permit to install is to allow a facility-wide increase in the throughput of gasoline and distillate which will increase VOC emissions to above the Title V threshold of 100 tpy. Only 4 units at the facility are subject to OAC rule 3745 chapter 31, which requires units to have an installation permit.
Permit Type: Administrative Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/2/2016
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Buckeye Terminals LLC - Columbus South Terminal
303 WILSON ROAD
Columbus, OH 43204

of a Permit-to-Install 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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120898

Permit Description: This permit to install is to allow a facility-wide increase in the throughput of gasoline and distillate which will increase VOC emissions to above the Title V threshold of 100 tpy. Only 4 units at the facility are subject to OAC rule 3745 chapter 31, which requires units to have an installation permit.

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

Emissions Unit ID:	T007
Company Equipment ID:	Tank #6
Superseded Permit Number:	P0115091
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T008
Company Equipment ID:	Tank #7
Superseded Permit Number:	P0115091
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T017
Company Equipment ID:	Tank #9
Superseded Permit Number:	P0115091
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T020
Company Equipment ID:	Tank #11
Superseded Permit Number:	P0115091
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0120898
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Draft Permit-to-Install
Buckeye Terminals LLC - Columbus South Terminal
Permit Number: P0120898
Facility ID: 0125040239
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The emissions of volatile organic compounds (VOC) from J001, T001, T002, T003, T004, T005, T007, T008, T017, T018, T019, T020, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 160.42 tons per rolling, 12-month period.
3. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
4. The permittee shall, on a monthly basis, maintain the following information for the entire facility:
 - a) the total throughput of gasoline (i.e. gasoline, ethanol, and gasoline additives), in gallons;
 - b) the total throughput of distillates (i.e. diesel and diesel additives), in gallons;
 - c) the total VOC emissions, in tons per month;
 - d) the individual HAP emissions, in tons per month;
 - e) the combined HAPs emissions, in tons per month;
 - f) the rolling, 12-month summation of total VOC emissions, in tons;
 - g) the rolling, 12-month summation of individual HAP emissions, in tons; and
 - h) the rolling, 12-month summation of combined HAPs emissions, in tons.
5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a) all exceedances of the rolling, 12-month VOC emissions limitation;
 - b) all exceedances of the rolling, 12-month individual HAP emissions limitation; and
 - c) all exceedances of the rolling, 12-month combined HAPs emissions limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

6. Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

7. Emissions Limitation:

The emissions of volatile organic compounds (VOC) from J001, T001, T002, T003, T004, T005, T007, T008, T017, T018, T019, T020, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 160.42 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined in accordance with the recordkeeping requirements in B.4. above and as follows:

- a) VOC emissions from gasoline and distillate loading in J001 shall be determined in accordance with the monitoring and recordkeeping requirements in B.4. above and a summation of the stack and fugitive emissions from gasoline and distillate loading as follows:
 - (1) For stack emissions from gasoline loading, sum the monthly gasoline throughputs for the 12-month period and multiply this sum by the emissions factor established based upon the most recent emissions test that demonstrated the emissions unit was in compliance (in lb VOC/1,000 gal gasoline loaded) and divide by 2,000 lb/ton.
 - (2) For fugitive emissions from gasoline loading, sum the monthly gasoline throughputs for the 12-month period and divide this sum by 2,000 lb/ton and multiply by the emission factor 0.00010849 lb/gal (13 mg/L) obtained from Appendix A of U.S. EPA's Gasoline Distribution Industry (Stage I) – Background Information for Promulgated Standards (November 1994).
 - (3) For distillate fuel loading emissions, sum the distillate fuel throughputs for the 12-month period, divide this sum by 2,000 lb/ton, and multiply by the emissions factor (in lb VOC/1,000 gal gasoline) obtained using Equation 1 from AP-42, Section 5.2 multiplied by the overall reduction efficiency term of $(1 - \text{efficiency} / 100)$ (AP-42, Section 5.2 (June 2008), page 5.2-6) using an overall capture/control efficiency of 80%.
- b) VOC emissions from the storage tanks shall be determined using emissions calculations from the most recent version of AP-42 "Compilation of Air Pollutant Emission Factors".
- c) VOC emissions from roof landing and tank cleaning shall be determined using the most recent version of AP-42 "Compilation of Air Pollutant Emission Factors".
- d) VOC emissions from pumps, flanges and valves shall be determined using U.S. EPA's "Protocol for Equipment Leak Emission Estimates" (11/95).

8. Emissions Limitations:

The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.

Applicable Compliance Method:

Compliance with these emissions limitations shall be determined as follows:



- a) For individual and combined HAP emissions from gasoline loading, multiply the VOC emissions by the following HAP emission factors from U.S. EPA's "Gasoline Distribution Industry (Stage I) – Background Information for Proposed Standards" (January 1994) Table 3-2:
 - benzene – 0.4 percent (w/w) of VOC emissions as benzene emissions;
 - ethylbenzene – 0.1 percent (w/w) of VOC emissions as ethylbenzene emissions;
 - hexane – 1.4 percent (w/w) of VOC emissions as hexane emissions;
 - toluene – 1.1 percent (w/w) of VOC emissions as toluene emissions;
 - xylene – 0.4 percent (w/w) of VOC emissions as xylene emissions; and
 - 2,2,4-trimethylpentane – 0.7 percent (w/w) of VOC emissions as 2,2,4-trimethylpentane emissions.

 - b) For individual and combined HAP emissions from distillate loading, multiply the VOC emissions by the following HAP emission factors:
 - 2,2,4-trimethylpentane – 0.0032695 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions;
 - benzene – 0.0214899 pound of benzene emissions per pound of VOC emissions;
 - cumene – 0.0019394 pound of cumene emissions per pound of VOC emissions;
 - ethylbenzene – 0.0089161 pound of ethylbenzene emissions per pound of VOC emissions;
 - hexane – 0.001 pound of hexane emissions per pound of VOC emissions;
 - toluene – 0.06003 pound of toluene emissions per pound of VOC emissions; and
 - xylene – 0.0291038 pound of xylene emissions per pound of VOC emissions.

 - c) For individual and combined HAP emissions from the storage tanks, use the emissions calculations from the most recent version of AP-42 "Compilation of Air Pollutant Emission Factors".
9. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



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C. Emissions Unit Terms and Conditions



1. T007, Tank #6

Operations, Property and/or Equipment Description:

623,055 Gallon Gasoline Storage Tank with Internal Floating Roof

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR part 60, subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.97 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR part 60, subpart Kb.</p>
c.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid MACT]	See 2. through 7. of Section B – Facility-Wide Terms and Conditions.
d.	40 CFR part 60, subpart A	See b)(2)a. below.
e.	40 CFR part 60, subpart Kb	See c)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR part 60, subpart A (60.1-60.19) as specified in 40 CFR part 60, subpart Kb.

c) Operational Restrictions

(1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

- a. 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.
 - b. The internal floating roof shall be equipped with 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.
 - c. Each opening in a non-contact 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.
 - d. 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.
 - e. 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.
 - f. 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.
 - g. 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.
 - h. 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.
 - i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and



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

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping, and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Director (Ohio EPA, Central District Office), 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.
- (3) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.

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. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 3.97 tons per year.

- a. Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks.

- (2) The permittee shall comply with the applicable testing procedures and requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

- (1) None.



2. T008, Tank #7

Operations, Property and/or Equipment Description:

445,543 Gallon Gasoline Storage Tank with Domed External Floating Roof (for calculations, treated as an Internal Floating Roof per AP-42, Section 7.1.1.4)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR part 60, subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.91 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR part 60, subpart Kb.</p>
c.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid MACT]	See 2. through 7. of Section B – Facility-Wide Terms and Conditions.
d.	40 CFR part 60, subpart A	See b)(2)a. below.
e.	40 CFR part 60, subpart Kb	See c)(1) below.

- (2) Additional Terms and Conditions
 - a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR part 60, subpart A (60.1-60.19) as specified in 40 CFR part 60, subpart Kb.
- c) Operational Restrictions
 - (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

- a. 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.
 - b. The internal floating roof shall be equipped with 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.
 - c. Each opening in a non-contact 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.
 - d. 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.
 - e. 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.
 - f. 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.
 - g. 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.
 - h. 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.
 - i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and



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

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping, and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Director (Ohio EPA, Central District Office), 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.
- (3) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.

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. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 1.91 tons per year.

- Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks. Per Section 7.1.1.4 of AP-42, this tank should be treated as an internal floating roof tank when calculating emissions.

- (2) The permittee shall comply with the applicable testing procedures and requirements as specified in 40 CFR Part 60.113b.



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- g) Miscellaneous Requirements
 - (1) None.



3. T017, Tank #9

Operations, Property and/or Equipment Description:

2,311,856 Gallon Gasoline Storage Tank with Domed External Floating Roof

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR part 60, subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 4.2 tons per year.
c.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid MACT]	See 2. through 7. of Section B – Facility-Wide Terms and Conditions.
d.	40 CFR part 60, subpart A	See b)(2)a. below.
e.	40 CFR part 60, subpart Kb	See c)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR part 60, subpart A (60.1-60.19) as specified in 40 CFR part 60, subpart Kb.

c) Operational Restrictions

(1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

a. 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.

- b. The internal floating roof shall be equipped with 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.
 - c. 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.
 - d. 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.
 - e. 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.
 - f. 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.
 - g. 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.
 - h. 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.
 - i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.



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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping, and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Director (Ohio EPA, Central District Office), 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.
- (3) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.

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. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 4.2 tons per year.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks.

- (2) The permittee shall comply with the applicable testing procedures and requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

- (1) None.



4. T020, Tank #11

Operations, Property and/or Equipment Description:

616,500 Gallon Gasoline Storage Tank with Internal Floating Roof

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR part 60, subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.40 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR part 60, subpart Kb.</p>
c.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid MACT]	See 2. through 7. of Section B – Facility-Wide Terms and Conditions.
d.	40 CFR part 60, subpart A	See b)(2)a. below.
e.	40 CFR part 60, subpart Kb	See c)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR part 60, subpart A (60.1-60.19) as specified in 40 CFR part 60, subpart Kb.

c) Operational Restrictions

(1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

- a. 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.
 - b. The internal floating roof shall be equipped with 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.
 - c. Each opening in a non-contact 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.
 - d. 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.
 - e. 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.
 - f. 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.
 - g. 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.
 - h. 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.
 - i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and



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

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall maintain annual records of the VOC emissions, in tons.
- (4) The permittee shall comply with the applicable reporting, recordkeeping, and monitoring of operations requirements as specified in 40 CFR Parts 60.115b through 60.116b.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Director (Ohio EPA, Central District Office), 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.
- (3) The permittee shall comply with the applicable reporting and recordkeeping requirements as specified in 40 CFR Part 60.115b.

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. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 1.40 tons per year.

- a. Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and formulas specified in AP-42, 5th Edition, Chapter 7.1, Organic Liquid Storage Tanks.

- (2) The permittee shall comply with the applicable testing procedures and requirements as specified in 40 CFR Part 60.113b.

g) Miscellaneous Requirements

- (1) None.