



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

11/4/2016

Certified Mail

Mrs. Kimberly Trostel
 Buckeye Terminals LLC - Cleveland Plant
 940 Buckeye Road
 Lima, OH 45804

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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: 1318002740
 Permit Number: P0121513
 Permit Type: Renewal
 County: Cuyahoga

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 Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Cleveland Division of Air Quality 2nd Floor 75 Erieview Plaza Cleveland, OH 44114
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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 Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

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

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 Renewal

Buckeye Terminals LLC - Cleveland Plant

2201 West Third St., Cleveland, OH 44113

ID#:P0121513

Date of Action: 11/4/2016

Permit Desc:Renewal FEPTIO for one loading rack (J001) equipped with a VRU and back-up PVCU, six storage tanks equipped with IFRs (T001-T006), and two fixed roof interface tanks (T009-T010). This renewal also incorporates CEMS terms for J001's VRU, and terms for the use of the PVCU during VRU downtime/maintenance..

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

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Buckeye Terminals – Cleveland Terminal receives a variety of fuels, including various grades of gasoline, distillate fuel oil, kerosene, and interface via pipeline. The fuels are then stored in bulk storage tanks, until transferred to cargo tank trucks via loading rack. The facility operates a loading rack (J001) and ten storage tanks (T001, T002, T003, T004, T005, T006, T009, T010, T011, and T012).

3. Facility Emissions and Attainment Status:

Facility actual VOC emissions reported for 2015 were 24.36 tons.

The facility-wide potential to emit (PTE) for VOC emissions have been calculated at 76.03 TPY. The facility-wide allowable emissions rate has been set at 80 tons per year for VOC. Using updated emissions factors for HAPs, individual HAP emissions will not exceed 3 TPY and combined HAP emissions will not exceed 6 tons per year. Due to the increase in individual HAP emissions for hexane to above 1 TPY, minor source modeling was performed.

The proposed facility wide allowable for VOC, individual hazardous air (HAP), and combined HAP is below Title V thresholds and MACT applicability requirements, and will be maintained by the voluntary annual throughput limitation of 300,000,000 gallons of gasoline and distillates (all liquid organics) through the loading rack (J001).

Cuyahoga County is currently in non-attainment for PM_{2.5}, ozone, and partial non-attainment for lead.

4. Source Emissions:

The facility has requested a federally enforceable throughput limitation of 300,000,000 gallons per year. All fuel storage tanks are connected to the loading rack which is controlled by a vapor recovery unit. The throughput limitation at the loading rack creates a “bottleneck” thus limiting the emissions generated by the storage tanks.

In addition, emissions from the back-up PVCU associated with the loading rack (J001) were calculated to be 4.47 TPY NO_x and 11.17 TPY CO, at PTE.

5. Conclusion:

The PTE for VOC, individual HAP, and combined HAPs has been restricted below Title V and MACT applicability thresholds with the federally enforceable annual throughput limitation of 300,000,000 gallons per year. Provided that Buckeye Terminals maintains compliance with the terms and conditions for J001, T001 through T006, and T009 through T012, the facility will not be subject to Title V permitting. Monthly record keeping of fuel throughput is required.

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	80
Individual HAP	3
Combined HAP	6
NOx	4.47
CO	11.17



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Cleveland Plant**

Facility ID:	1318002740
Permit Number:	P0121513
Permit Type:	Renewal
Issued:	11/4/2016
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 - Cleveland Plant

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Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Cleveland Plant
Permit Number: P0121513
Facility ID: 1318002740
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318002740
Application Number(s): A0056241
Permit Number: P0121513
Permit Description: Renewal FEPTIO for one loading rack (J001) equipped with a VRU and back-up PVCU, six storage tanks equipped with IFRs (T001-T006), and two fixed roof interface tanks (T009-T010). This renewal also incorporates CEMS terms for J001's VRU, and terms for the use of the PVCU during VRU downtime/maintenance.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/4/2016
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 - Cleveland Plant
2201 West Third St
Cleveland, OH 44113

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0121513

Permit Description: Renewal FEPTIO for one loading rack (J001) equipped with a VRU and back-up PVCU, six storage tanks equipped with IFRs (T001-T006), and two fixed roof interface tanks (T009-T010). This renewal also incorporates CEMS terms for J001's VRU, and terms for the use of the PVCU during VRU downtime/maintenance.

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 - (FUG 1)
 Superseded Permit Number: P0107378
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T009
 Company Equipment ID: TANK 22
 Superseded Permit Number: 13-2423
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T010
 Company Equipment ID: TANK 23
 Superseded Permit Number: P0107378
 General Permit Category and Type: Not Applicable

Group Name: Six (6) ASTs Equipped with IFRs

Emissions Unit ID:	T001
Company Equipment ID:	TANK 1
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	TANK 2
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	TANK 3
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	TANK 4
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	TANK 5
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T006
Company Equipment ID:	TANK 6
Superseded Permit Number:	P0107378
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Cleveland Plant

Permit Number: P0121513

Facility ID: 1318002740

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 Cleveland Division of Air Quality 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 - Cleveland Plant

Permit Number: P0121513

Facility ID: 1318002740

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) d)(2)-(5) and e)(2)

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.

(2) b), c), d), f), and g).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V and MACT applicability.	See b)(2)a.

(2) Additional Terms and Conditions

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

- i. 80 tons of volatile organic compounds (VOC);
- ii. 6 tons of combined hazardous air pollutants (HAPs); and
- iii. 3.6 tons of individual HAP.

c) Operational Restrictions

(1) None.

d) Monitoring and Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:



- a. the calculated, total VOC and HAP (individual and combined HAPs) emissions (in tons), and;
 - b. the rolling, 12-month summations of VOC and HAP (individual and combined HAPs) emissions (in tons) from gasoline, distillates, Jet A, additives and interface (pipeline transmix) for all emissions units at the facility, in tons.
- (2) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, J001, T001-T006, T009, and T010, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: hexane

TLV (mg/m³): 176.237

Maximum Hourly Emission Rate (lb/hr): 0.744

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 396.84

MAGLC (ug/m³): 4196.12

The permittee, has demonstrated that emissions of hexane, from emissions units J001, T001-T006, T009, and T010, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month VOC emission limitation of 80 tons;
 - ii. the rolling, 12-month individual HAP emissions limitation of 3.6 tons; and
 - iii. the rolling, 12-month combined HAPs emissions limitation of 6 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

- i. VOC emissions from the storage tanks shall be determined using the most recent version of AP – 42, Chapter 7, Storage Tanks or equivalent program.
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).
- iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99.2 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

- b. Emission Limitations:
6 tons of combined HAPs per rolling, 12-month summation from all facility emissions units.

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

Applicable Compliance Method:

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

To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in b)(1), the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in pounds per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emissions factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline.

- i. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
- (a) 2,2,4 trimethylpentane – 0.7 percent (w/w) VOC emissions as 2,2,4 trimethylpentane;
 - (b) benzene - 0.4 percent (w/w) VOC emissions as Benzene;
 - (c) ethyl benzene - 0.1 percent (w/w) VOC emissions as 2,2,4 ethyl benzene;
 - (d) hexane - 1.4 percent (w/w) VOC emissions as hexane;
 - (e) toluene - 1.1 percent (w/w) VOC emissions as toluene; and
 - (f) xylene - 0.4 percent (w/w) VOC emissions as xylene.
- ii. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- iii. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Cleveland Division of Air Quality and the permittee.



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Cleveland Plant

Permit Number: P0121513

Facility ID: 1318002740

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>



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C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Truck loading rack for gasoline, distillates, Jet A, additives and interface (pipeline transmix) controlled with a carbon absorption/gasoline absorption vapor recovery unit (VRU).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

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

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) Synthetic Minor to avoid Title V and MACT applicability.	<u>Gasoline loading Controlled by Vapor Recovery Unit (VRU) (i.e., gasoline, additives and interface):</u> 0.167 pound of volatile organic compounds (VOC) per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel. <u>Gasoline loading (fugitive losses):</u> 0.067 pound of VOC per 1,000 gallons (8 mg/l) of gasoline loaded into the delivery vessel. The total annual VOC emissions from this emissions unit shall not exceed 36.28 tons per year, from gasoline loading and fugitive emissions, as a rolling, 12-month summation. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 0.93 ton per month averaged over a twelve-month rolling period. See b)(2)c. and b)(2)d. below.
c.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NOx) emissions shall not exceed 0.37 ton per month averaged over a twelve-month rolling period. See b)(2)c. through b)(2)f. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)g. below.
e.	OAC rule 3745-21-09(Q)	The VOC emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05.

(2) Additional Terms and Conditions

- a. Each continuous VOC monitoring system, if utilized for demonstrating continuous compliance, 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(s), 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(s), 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 (CEMS) consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- c. All gasoline and distillate loading shall be controlled by a vapor recovery unit (VRU) or other such device (portable vapor combustion unit (PVCU)) capable of

achieving the allowable emissions limitations required by this permit when the VRU is undergoing routine or emergency maintenance.

- d. The permittee shall comply with the emissions limitations for CO and NO_x only when using the backup portable VCU as a means of controlling VOC emissions from this emissions unit.
- e. The CO and NO_x emissions limits were established to reflect the potentials 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 limitations.
- f. This Best Available Technology (BAT) emission limit applies until 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) into the Ohio State Implementation Plan (SIP).
- g. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) Compliance with the emission limitations as specified in Section b)(1)a. shall be achieved by restricting the annual throughput of refined petroleum product (i.e., gasoline, distillates, Jet A, additives and interface (pipeline transmix)). The annual throughput of refined petroleum product shall not exceed 300,000,000 gallons based upon a rolling, 12-month summation of the product throughput amounts.
- (2) The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any product into tank trucks.
- (3) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any 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.
- (4) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system;
 - b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

- (5) 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.
- (6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (7) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
- (8) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
- (9) The following VRU parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges during CEMS downtime as an alternative operating scenario, per 40 CFR 63 Subpart BBBBBB:
 - a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;
 - b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;
 - c. to ensure a proper flow rate from the absorption tower to the carbon bed, the absorber pressure shall be maintained between 8 psi and 15 psi; and
 - d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 150 degrees F.

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

- (10) When emissions are vented to the vapor combusting unit (PVCU) for control, the pilot flame of the vapor combustion unit (PVCU) shall be maintained at all times during the loading of gasoline (including gasoline and gasoline additives) or distillates (i.e. diesel or diesel additives).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
 - a. the total, individual throughputs of refined petroleum product (distillates, Jet A, additives and interface (pipeline transmix)) from emissions unit J001, in gallons;

- b. the rolling, 12-month summation of the total refined petroleum product throughput, in gallons (i.e., the monthly value from (a) added to the total product throughput for the previous 11-month period); and
- c. the total emissions of VOC from this emissions unit, in tons.

These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director, or any authorized representative of the Director for review during normal business hours.

- (2) The permittee shall implement a preventive maintenance program (PMP) for the VRU which has been approved by the Cleveland Division of Air Quality (CDAQ). The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the CDAQ.
- (3) The permittee shall maintain the data required by the VRU manufacturer's recommended daily operating guidelines on a daily basis, excluding Saturdays, Sundays and holidays. The permittee shall submit a copy of the operating guidelines to the CDAQ within 90 days of the issuance of this permit. Any subsequent changes to these operating guidelines shall be mutually agreeable to the permittee and the CDAQ.
- (4) The permittee shall collect and record the following information for each day (excluding Saturdays, Sundays and holidays) for the control equipment during CEMS downtime as an alternative operating scenario, per 40 CFR 63 Subpart BBBBBB:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the petroleum product supply temperature in degrees F;
 - d. the absorber pressure in psi; and
 - e. the carbon bed temperatures in degrees F.
- (5) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (6) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

- (7) The permittee shall 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. 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.

Once a VOC CEMS is installed, certified and operating in accordance with the quality assurance/quality control plan specified in b)(2)a., the permittee shall not be required to monitor the VOC exhaust gas concentration on a monthly basis because VOC emissions shall be monitored and recorded on a continuous basis.

The permittee may choose to revert back to monthly monitoring by Method 21 in lieu of monitoring by the VOC CEMS. If the permittee chooses to do so, it shall be noted in the next quarterly report.

- (8) 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 Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

- (9) If a continuous system is used instead of alternative monitoring, the permittee shall install, operate, and maintain equipment to continuously monitor and record VOC emissions from this emissions unit in units of the applicable standard(s), using the detection principle of the reference method specified in the regulation(s) or this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous VOC monitoring system including, but not limited to:

- a. emissions of VOCs in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of VOCs in units of the applicable standard(s) in the appropriate averaging period;
- c. results of 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 (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.

- (10) When emissions are vented to the vapor combustor unit (VCU) 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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. annual throughput of organic distillates shall not exceed 300,000,000 gallons per rolling 12-month period; and
 - ii. all periods of time during which the emissions were vented to the vapor combustor unit (VCU) for control, and the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The

reports shall include the date, time, and duration of each such period and an explanation of any corrective action taken to prevent similar occurrences.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Cleveland Division of Air Quality (CDAQ) 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous VOC monitoring system, if such system is installed and certified:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland DAQ, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

- b. These quarterly reports shall be submitted by January 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 (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous VOC monitoring system while the emissions unit was in operation;
 - viii. 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, the results of any relative accuracy test audit showing the continuous VOC monitor out-of-control and the compliant 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 event in (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(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report.

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

f) Testing Requirements

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

a. Emission Limitation:

0.167 pound of VOC per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel.

Applicable Compliance Method:

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

b. Emission Limitation:

Volatile organic compound emissions from gasoline loading (fugitive losses) shall not exceed 0.067 pound of VOC per 1,000 gallons (8 mg/l) of gasoline loaded into the delivery vessel.

Applicable Compliance Method:

The fugitive VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 8 mg/l from the trucks. The 8 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

c. Emissions Limitation:

Annual VOC emissions from gasoline loading and fugitive losses shall not exceed 36.28 tons of VOC per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined through compliance with the short term limitations and annual throughput limitation.

d. Emissions Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.93 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

This limit was established by multiplying the throughput limitation established under OAC rule 3745-31-05(D) multiplied by 5 lbs vapor/1,000 gallons loaded multiplied by the CO emissions factor(0.0834 lb/gal) found in AP-42, Section 1.3, Table 1.3-1, or the emissions factors provided by the manufacturer, whichever was higher. Compliance shall be assumed provided the permittee demonstrates compliance with the throughput limitations established under OAC rule 3745-31-05(D).



$$[(300,000,000 \text{ Gallons of Liquid Loaded}) \times (5 \text{ lbs of Vapor} / 1,000 \text{ Gallons of Liquid Loaded})] / (5.6 \text{ lb/gal}) = 267,857 \text{ gallons of vapor loaded}$$

$$[(267,857 \text{ gallons of vapor loaded}) \times (0.0834 \text{ lb/gal})] / (2,000 \text{ lbs/ton}) = 11.17 \text{ TPY CO}$$

$$11.17 \text{ TPY} / 12 \text{ months} = 0.93 \text{ TPM CO}$$

e. Emissions Limitation:

Nitrogen oxides (NOx) emissions shall not exceed 0.37 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

This limit was established by multiplying the throughput limitation established under OAC rule 3745-31-05(D) multiplied by 5 lbs vapor/1,000 gallons loaded multiplied by the NOx emissions factor(0.0834 lb/gal) found in AP-42, Section 1.3, Table 1.3-1, or the emissions factors provided by the manufacturer, whichever was higher. Compliance shall be assumed provided the permittee demonstrates compliance with the throughput limitations established under OAC rule 3745-31-05(D).

$$[(300,000,000 \text{ Gallons of Liquid Loaded}) \times (5 \text{ lbs of Vapor} / 1,000 \text{ Gallons of Liquid Loaded})] / (5.6 \text{ lb/gal}) = 267,857 \text{ gallons of vapor loaded}$$

$$[(267,857 \text{ gallons of vapor loaded}) \times (0.0334 \text{ lb/gal})] / (2,000 \text{ lbs/ton}) = 4.47 \text{ TPY NOx}$$

$$4.47 \text{ TPY} / 12 \text{ months} = 0.37 \text{ TPM NOx}$$

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted no later than five (5) years from the most recent stack test. This test shall be performed between the months of May and September, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ). This most recent stack test on the VRU was performed May17, 2016.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 2A
Method 21
Method 25B
Method 205

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limit and/or control requirements, although there may be circumstances where a lower emissions loading is deemed the most challenging scenario, unless otherwise specified or approved by the CDAQ.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the CDAQ's refusal to accept the results of the emission test(s).
 - f. Personnel from the CDAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the CDAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CDAQ.
- (3) The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible on testing day.)
- (4) If a CEMS is installed and certified, within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous VOC monitoring system pursuant to 40 CFR Part 60, Appendix B, Performance Specification 8 or 9 (as appropriate); ORC section 3704.03(l); and using the VOC detection method that is appropriate for the VOC species present in the emission gases.

Personnel from the Ohio EPA Central Office and the CDAQ shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. The test results shall be submitted to Ohio EPA, through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"), and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous VOC monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of

40 CFR Part 60, Appendix B, Performance Specification 8 or 9 and ORC section 3704.03(I).

Ongoing compliance with the VOC emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

g) Miscellaneous Requirements

- (1) This emissions unit consists of the following equipment:
 - a. 6 bottom loading arms in 3 bays for loading gasoline, additives, and interface into the delivery vessels.
 - i. Bay number one has 2 gasoline bottom loading arms;
 - ii. Bay number two (middle bay) has 2 gasoline bottom loading arms; and
 - iii. Bay number three has 2 gasoline bottom loading arms.
- (2) To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in b)(1) the permittee shall employ the following:
 - a. VOC emissions from the storage tanks shall be determined using the most recent version of AP – 42, Chapter 7, Storage Tanks or equivalent program.
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. The fugitive VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 8 mg/l from the trucks. The 8 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - d. The VOC emissions from distillates, transmix, and/or other material loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- (3) Superseded permits include: State PTO P0054312 issued final 3/3/1995; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.
- (4) This emissions unit was installed in 1972.

2. T009, TANK 22

Operations, Property and/or Equipment Description:

21,000 gallon fixed roof interface tank.

h) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

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

i) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(c)	See b)(2)a. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT Applicability	See b)(2)c. and c)(2) below.
c.	OAC rule 3745-21-07(K)(4)	See c)(1) below.
d.	OAC rule 3745-21-09(L)(1)	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee shall equip this emission with a submerged filling system and pressure/vacuum relief vent valves.

b. Pursuant to OAC rule 3745-21-09(L)(2)(a), this emission unit is exempt from the requirements specified in paragraph (L)(1) of OAC rule 3745-21-09.

- c. The total VOC emissions from emissions units T009 and T010 located at this facility shall not exceed 0.57 ton combined per year as a rolling, 12-month summation.

j) **Operational Restrictions**

- (1) The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.5 pounds per square inch absolute, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09.
- (2) The annual throughput of interface (pipeline transmix) for emissions units T009 and T010 shall not exceed 100,800 gallons based upon a rolling, 12-month summation of the interface throughput amounts.

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

- (1) The permittee shall maintain records of the following information:
 - 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 liquid.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total throughput of interface, in gallons;
 - b. the rolling, 12-month summation of the total interface throughput, in gallons (i.e., the monthly value from (a) added to the total interface throughput for the previous 11-month period);
 - c. the total VOC emissions from emissions units T009 and T010, in tons; and
 - d. the rolling, 12-month summation of VOC emissions from emissions units T009 and T010, in tons.

l) **Reporting Requirements**

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. the rolling, 12-month summation of the total interface throughput, in gallons; and
- ii. the rolling, 12-month emission limitation for VOC from emissions units T009 and T010.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

m) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(2)c. shall be determined in accordance with the following methods:
 - a. Emission Limitations:
VOC emissions generated from working and standing losses for emissions units T009 and T010 shall not exceed 0.57 TPY combined.
 - b. Applicable Compliance Method:
Compliance with the annual working and standing loss VOC emission limitation for emissions units T009 and T010 shall be determined by using the most recent version of AP – 42, Chapter 7, Storage Tanks or equivalent program.

n) Miscellaneous Requirements

- (1) This emission unit was installed in 1991.
- (2) Superseded permits include: PTI 13-2423 issued final 5/6/1992; Registration P0054319 issued final 6/26/1992.



3. T010, TANK 23

Operations, Property and/or Equipment Description:

21,000 gallon fixed roof interface tank.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(c)	See b)(2)a. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and MACT applicability.	See b)(2)c. and c)(1) below.
c.	OAC rule 3745-21-09(L)(1)	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee shall equip this emission with a submerged filling system and pressure/vacuum relief vent valves.

b. Pursuant to OAC rule 3745-21-09(L)(2)(a), this emission unit is exempt from the requirements specified in paragraph (L)(1) of OAC rule 3745-21-09.

c. The total VOC emissions from emissions units T009 and T010 located at this facility shall not exceed 0.57 ton per year (combined) as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The annual throughput of interface (pipeline transmix) for emissions units T009 and T010 (combined) shall not exceed 100,800 gallons based upon a rolling, 12-month summation of the interface throughput amounts.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:
 - 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 liquid.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total throughput of interface, in gallons;
 - b. the rolling, 12-month summation of the total interface throughput, in gallons (i.e., the monthly value from (a) added to the total interface throughput for the previous 11-month period);
 - c. the total VOC emissions from emissions units T009 and T010, in tons; and
 - d. the rolling, 12-month summation of VOC emissions from emissions units T009 and T010, in tons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month summation of the total interface throughput, in gallons; and
 - ii. the rolling, 12-month emission limitation for VOC from emissions units T009 and T010.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitations:

- VOC emissions generated from working and standing losses for emission units T009 and T010 shall not exceed 0.57 TPY combined.

- Applicable Compliance Method:

- Compliance with the annual working and standing loss VOC emission limitation for emission units T009 and T010 shall be determined by using the most recent version of AP – 42, Chapter 7, Storage Tanks or equivalent program.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1991.
- (2) Superseded permits include: PTI 13-2423 issued final 5/6/1992; Registration P0054320 issued final 6/26/1992; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.

4. Emissions Unit Group - Six (6) ASTs Equipped with IFRs: T001, T002, T003, T004, T005, T006

EU ID	Operations, Property and/or Equipment Description
T001	437,700 gallon above ground storage tank with an internal floating roof.
T002	1,351,600 gallon above ground storage tank with an internal floating roof.
T003	1,355,000 gallon above ground storage tank with an internal floating roof.
T004	1,382,900gallon above ground storage tank with an internal floating roof.
T005	1,131,400gallon above ground storage tank with an internal floating roof.
T006	1,135,700gallon above ground storage tank with an internal floating roof.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. b)(1)a., b)(2)a., b)(2)b., c)(1), d)(3), e)(2) and f)(1).

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

- (2) Additional Terms and Conditions
 - a. The total combined VOC emissions generated from working and standing losses for emission units T001 through T006 shall not exceed 23.91 tons per year as a rolling, 12-month summation.
 - b. The total combined VOC emissions generated from roof landing losses for emission units T001 through T006 shall not exceed 15 tons per year as a rolling, 12-month summation.
- c) Operational Restrictions
 - (1) The annual throughput of refined petroleum product for emissions units T001 through T006 shall not exceed 300,000,000 gallons based upon a rolling, 12-month summation of the product throughput amounts.
 - (2) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of the following information for the 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 monthly records of the following information:
 - a. The total throughput of refined petroleum product, in gallons;

- b. The rolling, 12-month summation of the total product throughput, in gallons (i.e., the monthly value from (a) added to the total product throughput for the previous 11-month period); and
 - c. The total VOC emissions from units T001 through T006, in tons, and
 - d. the rolling, 12-month summation of VOC emissions from emissions units T001 through T006, in tons.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month summation of the total refined petroleum product throughput; and
 - ii. the rolling, 12-month summation of VOC emissions from emission units T001 through T006.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (3) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
 - (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the

due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

Combined VOC emissions generated from working and standing losses for emission units T001 through T006 shall not exceed 23.91 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual working loss VOC emission limitation for emission units T001 through T006 shall be determined by using the most recent version of USEPA's "Tanks" or equivalent program.

b. Emission Limitations:

Combined VOC emissions generated from roof landing losses for emission units T001 through T006 shall not exceed 15 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual roof landing loss emission limitation for emission units T001 through T006 shall be determined by using the appropriate roof landing loss equations listed in AP-42, Section 7.1.3.2.2 7.1 Organic Liquid Storage Tanks - Roof Landings (2006) and the latest version of US EPA's TANKS software or equivalent program if necessary.

g) Miscellaneous Requirements

(1) Tanks T001-T006 were all installed in 1972.

(2) T001 superseded permits include: State PTO P0054313 issued final 10/12/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.

(3) T002 superseded permits include: State PTO P0054314 issued final 10/5/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.

(4) T003 superseded permits include: State PTO P0054315 issued final 10/5/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.

(5) T004 superseded permits include: State PTO P0054316 issued final 10/19/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.

(6) T005 superseded permits include: State PTO P0054317 issued final 10/19/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.



Draft Permit-to-Install and Operate
Buckeye Terminals LLC - Cleveland Plant

Permit Number: P0121513

Facility ID: 1318002740

Effective Date: To be entered upon final issuance

- (7) T006 superseded permits include: State PTO P0054318 issued final 10/5/1993; State PTO P0094420 issued final 12/30/1999; PTIO P0107378 issued final 8/30/2011.