

Facility ID: 1431071557 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit J004](#)
[Go to Part II for Emissions Unit J006](#)
[Go to Part II for Emissions Unit J007](#)
[Go to Part II for Emissions Unit J008](#)
[Go to Part II for Emissions Unit J102](#)
[Go to Part II for Emissions Unit J103](#)
[Go to Part II for Emissions Unit T001](#)
[Go to Part II for Emissions Unit T007](#)
[Go to Part II for Emissions Unit T008](#)
[Go to Part II for Emissions Unit T014](#)
[Go to Part II for Emissions Unit T018](#)
[Go to Part II for Emissions Unit T019](#)
[Go to Part II for Emissions Unit T020](#)
[Go to Part II for Emissions Unit T027](#)
[Go to Part II for Emissions Unit T029](#)
[Go to Part II for Emissions Unit T031](#)
[Go to Part II for Emissions Unit T033](#)
[Go to Part II for Emissions Unit T034](#)
[Go to Part II for Emissions Unit T037](#)
[Go to Part II for Emissions Unit T038](#)
[Go to Part II for Emissions Unit T041](#)
[Go to Part II for Emissions Unit T042](#)
[Go to Part II for Emissions Unit T043](#)
[Go to Part II for Emissions Unit T044](#)
[Go to Part II for Emissions Unit T045](#)
[Go to Part II for Emissions Unit T046](#)
[Go to Part II for Emissions Unit T047](#)
[Go to Part II for Emissions Unit T048](#)
[Go to Part II for Emissions Unit T049](#)
[Go to Part II for Emissions Unit T051](#)
[Go to Part II for Emissions Unit T052](#)
[Go to Part II for Emissions Unit T053](#)
[Go to Part II for Emissions Unit T115](#)
[Go to Part II for Emissions Unit T116](#)
[Go to Part II for Emissions Unit T118](#)
[Go to Part II for Emissions Unit T119](#)
[Go to Part II for Emissions Unit T120](#)
[Go to Part II for Emissions Unit T121](#)

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Facility ID: 1431071557 Emissions Unit ID: J004 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control</u>
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		<u>Measures</u>
gasoline loading rack controlled with a carbon adsorption/gasoline absorption vapor recovery unit	OAC rule 3745-31-05 See Section F.1.	The emission limit established by this rule is less stringent than that established in 40 CFR Part 60, Subpart XX and the emission limits contained in A.2. below.
	40 CFR Part 60, Subpart XX	The mass emissions of volatile organic compounds (VOC) from the vapor control system shall not exceed 0.29 pound of VOC per 1000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.
	OAC rule 3745-21-09(Q)	The emission limit established by this rule is less stringent than that established in 40 CFR Part 60, Subpart XX.
	OAC rule 3745-35-07	See A.2. below.

2. **Additional Terms and Conditions**

- (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. **Operational Restrictions**

- 1. a. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - i. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.
 - ii. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- b. The loading rack shall be equipped with a vapor control system whereby:
 - i. All vapors collected by the vapor collection system are vented to the vapor control system.
 - ii. 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.
- c. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- d. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- 2. a. The design of the system shall prevent vapors collected at one loading rack from passing to another.
- b. Gasoline loadings are made only into gasoline tank trucks equipped with vapor collection equipment compatible with the terminal's vapor collection system.
- c. The terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at this emissions unit.
- d. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4500 pascals (450 mm of water) during product loading. This level shall not be exceeded when measured by the procedures specified in 40 CFR 60.503(d).
- e. No pressure-vacuum vent in the terminal's vapor collection system shall begin to open at a system pressure less than 4500 pascals (450 mm of water).
- 3. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
 - a. Obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck loaded at this emissions unit.
 - b. Require the tank identification number to be recorded as each gasoline tank truck is loaded at this emissions unit.
 - c. Cross-check each tank identification number obtained in Section B.3.b. above with the file for tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
 - d. Notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at this emissions unit within 3 weeks after the loading has occurred.

- e. Not allow the reloading of nonvapor-tight gasoline trucks at this emissions unit until the vapor tightness documentation for the truck is obtained.
4. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
5. The temperature of the carbon bed, after regeneration (including any cooling cycle(s)), shall not be more than 10 percent above the maximum temperature for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.
6. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system 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.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
 - The total throughput of gasoline, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- A log of the operating time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
 - All carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated the emissions unit was in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle.
5. The permittee shall maintain records, at the terminal, of the tank truck vapor tightness documentation required under Section B.3.a, in accordance with 40 CFR 60.505(b). The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by 40 CFR Part 60, Appendix A, Method 27.
6. The permittee shall maintain records of each monthly leak inspection required under Section C.9, in accordance with 40 CFR 60.505(c).
7. The permittee shall maintain records of all notifications required under Section B.3.d.
8. The permittee shall maintain records for all replacements or additions of components performed on the vapor processing system.
9. Each calendar month during the loading of gasoline tank trucks, the permittee shall inspect the vapor collection system, the vapor control system, and each gasoline loading rack for total organic compounds liquid or vapor leaks. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after the leak is detected.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated the emissions unit was in compliance.
- The permittee shall submit quarterly summaries which include a log of the operating time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limit of .29 pound of VOC per 1000 gallons loaded.
 - c. The compliance test methods and procedures for the emission test for this emission unit shall follow those specified 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s). Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).
2. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
3. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in the permit to install 14-331 issued on April 29, 1981: A-D.
2. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: J006 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
non-gasoline tank truck loading rack controlled with a thermal incinerator	OAC rule 3745-21-07(E)	Organic compound (OC) emissions from this emissions unit shall be vented to a thermal incinerator with at least a 90% destruction efficiency.
	OAC rule 3745-35-07	See A.2. below.

2. Additional Terms and Conditions

- (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. All material loading from this emission unit shall be accomplished in such a manner that all displaced vapors and gases shall be vented only to the thermal incinerator. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The average combustion temperature within the thermal incinerator when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughputs of non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.

- b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day for the control equipment:
- a. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
 - 2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
 - 3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
- The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

E. Testing Requirements

- 1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the required 90% destruction efficiency.
 - c. The compliance test methods and procedures for the emission test shall follow those specified in Method 25B of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

- 2. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 3. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: J007 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
non-gasoline rail car loading rack	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-35-07	See A.2.a, b and c below.

2. Additional Terms and Conditions

- (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be

added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughputs of all non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:
 - a. The identification of each product.
 - b. Documentation on whether the product is a volatile photochemically reactive material.
 - c. The total throughput, in gallons, of all volatile photochemically reactive materials.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission

factors:

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: J008 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
barge loading rack	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-35-07	See A.2.a, b and c below.

2. Additional Terms and Conditions

- (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC

rule 3745-21-01(C), shall not exceed 40,000 gallons.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughputs of all non-gasoline materials, in gallons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:
 - a. The identification of each product.
 - b. Documentation on whether the product is a volatile photochemically reactive material.
 - c. The total throughput, in gallons, of all volatile photochemically reactive materials.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: J102 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
non-gasoline tank truck loading rack	OAC rule 3745-21-07(E)	See A.2.d below.
	OAC rule 3745-35-07	See A.2.a, b and c below.

- 2. **Additional Terms and Conditions**
 - (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

B. Operational Restrictions

- 1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
 - d. The total, individual throughputs of all non-gasoline materials, in gallons.
 - 2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 - 3. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
 - 4. If volatile photochemically reactive materials are loaded, then the permittee shall maintain daily records of the following information:
 - a. The identification of each product.
 - b. Documentation on whether the product is a volatile photochemically reactive material.
 - c. The total throughput, in gallons, of all volatile photochemically reactive materials.
- D. Reporting Requirements**
- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.a, b and c.
 - 2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
 - 3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.
- E. Testing Requirements**
- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
 - 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: J103 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
barge loading	OAC rule 3745-31-05	21.8 pounds of organic compounds (OC) per day
	See Section F.1.	4.0 tons of OC per year
		use of submerged filling for barges See A.2.e. below.
	OAC rule 3745-21-07(E)	See A.2.d. below.
	OAC rule 3745-35-07	See A.2.a, b and c below.

2. Additional Terms and Conditions

- (a) The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The emissions of VOC from all loading racks at this facility shall not exceed 55.8 TPY, based upon a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C), shall not exceed 40,000 gallons.

The amount of all materials loaded by this emissions unit shall not exceed 1,680,000 gallons per day.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The vapor pressure of any material loaded into the barges shall not exceed 0.0085 psia, at 60 degrees F.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
2. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.
4. The permittee shall maintain daily records of the following information for this emissions unit:
- The identification of each material loaded.
 - Documentation on whether the material loaded is a volatile photochemically reactive material.
 - The vapor pressure of each material loaded, in psia, at 60 degrees F.
 - The total throughput, in gallons, of all volatile photochemically reactive materials.
 - The total throughput, in gallons, of all materials.
 - The total OC emissions, in pounds.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the following:
- The rolling, 12-month summation limitations contained in A.2.a, b and c.
 - The vapor pressure limitation of .00085 psia, at 60 degrees F.
 - The pound per day emission limitation in A.1.
2. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
3. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded or days during which more than 1,680,000 gallons of all materials were loaded, and the actual volumes of the volatile photochemically reactive materials and all materials loaded during each such day.
4. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following:
- VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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."
 - VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-2566: A-D.
- 2. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T001 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.96 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored) OAC rule 3745-21-07(D) (when photochemically reactive materials are stored) OAC rule 3745-35-07	See A.2.a below. See A.2.b below. See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY

based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
- The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each specific HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
- VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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."
 - VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;

- v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T007 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.41 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T008 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.84 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.

The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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

d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T014 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.2 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this

emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading photochemically reactive materials.
- ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T018 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed

on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:

i. Submerged fill shall be utilized when loading photochemically reactive materials.

ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

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

- a. The identification and type of each liquid stored in this emissions unit.
- b. Documentation as to whether the material stored is a photochemically reactive material.
- c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
- d. The density of the material stored, in pounds per gallon.
- e. The total throughput of each material, in gallons.

2. The permittee shall maintain the following monthly emission information for this emissions unit:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each specific HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each individual HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

4. The permittee shall maintain rolling, 12-month summations for the following:

- a. The total emissions of VOC from all emissions units at the facility, in tons.
- b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.

3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:

- a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
- 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T019 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

- 2. **Additional Terms and Conditions**

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
- i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- B. Operational Restrictions**
1. None
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T020 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored) OAC rule 3745-21-07(D)	See A.2.a below. See A.2.b below.

(when photochemically reactive materials are stored)

OAC rule 3745-35-07

See A.2.c, d and e below.

2. Additional Terms and Conditions

(a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:

- i. Submerged fill shall be utilized when loading photochemically reactive materials.
- ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:

- a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
- 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.
- F. Miscellaneous Requirements**

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T027 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.96 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.
2. Additional Terms and Conditions		
(a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:		
i. The fixed roof storage tank shall be equipped with an internal floating roof.		
ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.		
iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:		
i. Submerged fill shall be utilized when loading photochemically reactive materials.		
ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.		
B. Operational Restrictions		
1. None		
C. Monitoring and/or Record Keeping Requirements		
1. The permittee shall maintain monthly records of the following information:		
a. The identification and type of each liquid stored in this emissions unit.		
b. Documentation as to whether the material stored is a photochemically reactive material.		
c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.		
d. The density of the material stored, in pounds per gallon.		
e. The total throughput of each material, in gallons.		
2. The permittee shall maintain the following monthly emission information for this emissions unit:		
a. The total emissions of VOC, in tons.		
b. The total emissions of each specific HAP, in tons.		
c. The aggregate sum of all HAPs, in tons.		
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:		
a. The total emissions of VOC, in tons.		
b. The total emissions of each individual HAP, in tons.		
c. The aggregate sum of all HAPs, in tons.		
4. The permittee shall maintain rolling, 12-month summations for the following:		
a. The total emissions of VOC from all emissions units at the facility, in tons.		
b. The total emissions of each individual HAP from all emissions units at the facility, in tons.		
c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.		
D. Reporting Requirements		
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.		
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.		
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the		

previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T029 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.45 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. **Additional Terms and Conditions**

- This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. **Operational Restrictions**

- None

C. **Monitoring and/or Record Keeping Requirements**

- The permittee shall maintain records of the following information:
 - The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
- The permittee shall maintain the following monthly emission information for this emissions unit:
 - The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
- The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
- The permittee shall maintain rolling, 12-month summations for the following:
 - The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. **Reporting Requirements**

- The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. **Testing Requirements**

- To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T031 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.4 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.

OAC rule 3745-35-07

See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition,

Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T033 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.43 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.

ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:

i. Submerged fill shall be utilized when loading photochemically reactive materials.

ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.

The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

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

- a. The identification and type of each liquid stored in this emissions unit.
- b. Documentation as to whether the material stored is a photochemically reactive material.
- c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
- d. The density of the material stored, in pounds per gallon.
- e. The total throughput of each material, in gallons.

2. The permittee shall maintain the following monthly emission information for this emissions unit:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each specific HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each individual HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

4. The permittee shall maintain rolling, 12-month summations for the following:

- a. The total emissions of VOC from all emissions units at the facility, in tons.
- b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.

3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:

- a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
- 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T034 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.96 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

- 2. **Additional Terms and Conditions**

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- B. Operational Restrictions**
1. None
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain records of the following information:
- The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
- VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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."
 - VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the

following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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

d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T037 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.68 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:

i. Submerged fill shall be utilized when loading photochemically reactive materials.

ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.

The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

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

- a. The identification and type of each liquid stored in this emissions unit.
- b. Documentation as to whether the material stored is a photochemically reactive material.
- c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
- d. The density of the material stored, in pounds per gallon.
- e. The total throughput of each material, in gallons.

2. The permittee shall maintain the following monthly emission information for this emissions unit:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each specific HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:

- a. The total emissions of VOC, in tons.
- b. The total emissions of each individual HAP, in tons.
- c. The aggregate sum of all HAPs, in tons.

4. The permittee shall maintain rolling, 12-month summations for the following:

- a. The total emissions of VOC from all emissions units at the facility, in tons.
- b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
- c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.

3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:

a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."

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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.

d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T038 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.34 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th

Edition, Table 5.1-2.

- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T041 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.59 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in

Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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

d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T042 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.21 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance

of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;

- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T043 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
21 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
 The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this

permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;

- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T044 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.21 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information:

- a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T045 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.21 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
 The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.

- c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
- The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
 - The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
 - The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
- To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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."
 - VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
 - To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.
- F. Miscellaneous Requirements**
- The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T046 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.41 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:

- a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.
- F. Miscellaneous Requirements**
1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T047 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.41 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D).
 The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
 The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.

3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T048 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.44 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month

summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T049 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
.44 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
- The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T051 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.1 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.
2. Additional Terms and Conditions		
(a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:		
i. The fixed roof storage tank shall be equipped with an internal floating roof.		
ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.		
iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:		
i. Submerged fill shall be utilized when loading photochemically reactive materials.		
ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.		
B. Operational Restrictions		
1. None		
C. Monitoring and/or Record Keeping Requirements		
1. The permittee shall maintain monthly records of the following information:		
a. The identification and type of each liquid stored in this emissions unit.		
b. Documentation as to whether the material stored is a photochemically reactive material.		
c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.		
d. The density of the material stored, in pounds per gallon.		
e. The total throughput of each material, in gallons.		
2. The permittee shall maintain the following monthly emission information for this emissions unit:		
a. The total emissions of VOC, in tons.		
b. The total emissions of each specific HAP, in tons.		
c. The aggregate sum of all HAPs, in tons.		
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:		
a. The total emissions of VOC, in tons.		
b. The total emissions of each individual HAP, in tons.		
c. The aggregate sum of all HAPs, in tons.		
4. The permittee shall maintain rolling, 12-month summations for the following:		
a. The total emissions of VOC from all emissions units at the facility, in tons.		
b. The total emissions of each individual HAP from all emissions units at the facility, in tons.		
c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.		
D. Reporting Requirements		
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.		
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.		
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each		

month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T052 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.46 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T053 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law

only with the exception of those listed below which are federally enforceable.

- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3.34 million gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
- The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
- The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
- The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

- To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in

section A.2, the permittee shall comply with the following:

- a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

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Facility ID: 1431071557 Emissions Unit ID: T115 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
19,900 gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.
2. Additional Terms and Conditions		
(a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.		
B. Operational Restrictions		
1. None		
C. Monitoring and/or Record Keeping Requirements		
1. The permittee shall maintain records of the following information: <ul style="list-style-type: none"> a. The identification and type of each liquid stored in this emissions unit. b. Documentation as to whether the material stored is a photochemically reactive material. c. The maximum true vapor pressure, in psia, as stored, of each liquid. d. The density of the material stored, in pounds per gallon. e. The total throughput of each material, in gallons. 		
2. The permittee shall maintain the following monthly emission information for this emissions unit: <ul style="list-style-type: none"> a. The total emissions of VOC, in tons. b. The total emissions of each individual HAP, in tons. c. The aggregate sum of all HAPs, in tons. 		
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility: <ul style="list-style-type: none"> a. The total emissions of VOC, in tons. b. The total emissions of each individual HAP, in tons. c. The aggregate sum of all HAPs, in tons. 		
4. The permittee shall maintain rolling, 12-month summations for the following: <ul style="list-style-type: none"> a. The total emissions of VOC from all emissions units at the facility, in tons. b. The total emissions of each individual HAP from all emissions units at the facility, in tons. c. The aggregate sum of all HAPs from all emissions units at the facility, in tons. 		
D. Reporting Requirements		
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.		
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.		
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.		
E. Testing Requirements		
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following: <ul style="list-style-type: none"> a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0." 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2. d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test 		

results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).

e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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

d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T116 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
19,900 gallon fixed roof storage tank	OAC rule 3745-21-07(D)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b, c, and d below.

2. Additional Terms and Conditions

- (a) This emissions unit is prohibited from storing any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), with a vapor pressure greater than 1.5 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any photochemically reactive material with a vapor pressure greater than 1.5 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-07(D). The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
- B. Operational Restrictions**
1. None
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain records of the following information:
- The identification and type of each liquid stored in this emissions unit.
 - Documentation as to whether the material stored is a photochemically reactive material.
 - The maximum true vapor pressure, in psia, as stored, of each liquid.
 - The density of the material stored, in pounds per gallon.
 - The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
- The total emissions of VOC, in tons.
 - The total emissions of each individual HAP, in tons.
 - The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
- The total emissions of VOC from all emissions units at the facility, in tons.
 - The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - The aggregate sum of all HAPs from all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.b, c and d.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 1.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.
- E. Testing Requirements**
1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
- VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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."
 - VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the

following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.

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

- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
- ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
- iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
- iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
- v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
- vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.

b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.

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

d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T118 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:

i. Submerged fill shall be utilized when loading photochemically reactive materials.

ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.

The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

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

- The identification and type of each liquid stored in this emissions unit.
- Documentation as to whether the material stored is a photochemically reactive material.
- The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
- The density of the material stored, in pounds per gallon.
- The total throughput of each material, in gallons.

2. The permittee shall maintain the following monthly emission information for this emissions unit:

- The total emissions of VOC, in tons.
- The total emissions of each specific HAP, in tons.
- The aggregate sum of all HAPs, in tons.

3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:

- The total emissions of VOC, in tons.
- The total emissions of each individual HAP, in tons.
- The aggregate sum of all HAPs, in tons.

4. The permittee shall maintain rolling, 12-month summations for the following:

- The total emissions of VOC from all emissions units at the facility, in tons.
- The total emissions of each individual HAP from all emissions units at the facility, in tons.
- The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.

2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.

3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:

- VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
- 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."
- VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
- The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).

- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethly benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T119 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored) OAC rule 3745-21-07(D) (when photochemically reactive materials are stored) OAC rule 3745-35-07	See A.2.a below. See A.2.b below. See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:

- i. The fixed roof storage tank shall be equipped with an internal floating roof.
- ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

- 1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th

Edition, Table 5.1-2.

- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
- 2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

- 1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T120 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive)	See A.2.b below.

materials are stored)
OAC rule 3745-35-07

See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
- i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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.
When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions.
The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.
The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."

- 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
- d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
- e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
- i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431071557 Emissions Unit ID: T121 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control</u>
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Measures

1.0 million gallon internal floating roof storage tank with submerged fill pipe	OAC rule 3745-21-09(L) (when petroleum liquids are stored)	See A.2.a below.
	OAC rule 3745-21-07(D) (when photochemically reactive materials are stored)	See A.2.b below.
	OAC rule 3745-35-07	See A.2.c, d and e below.

2. Additional Terms and Conditions

- (a) When petroleum liquids are stored in this emissions unit, the following requirements shall apply:
 - i. The fixed roof storage tank shall be equipped with an internal floating roof.
 - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
 - iii. 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. When photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are stored in this emissions unit, the following requirements shall apply:
 - i. Submerged fill shall be utilized when loading photochemically reactive materials.
 - ii. The vapor pressure of any photochemically reactive material stored in this emissions unit shall not exceed 12.5 pounds per square inch absolute (psia) or greater under actual storage conditions. The total emissions of any individual hazardous air pollutant (HAP), as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 10 tons per year (TPY), based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total emissions of all HAPs, as defined in section 112(b) of the 1990 Clean Air Act Amendments, from all emissions units at this facility shall be less than 25 TPY, based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The HAPs emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The total VOC emissions from all storage tanks located at this facility shall not exceed 35.06 TPY based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The VOC emitted during the first full calendar month after permit issuance shall be added to the emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The identification and type of each liquid stored in this emissions unit.
 - b. Documentation as to whether the material stored is a photochemically reactive material.
 - c. The maximum true vapor pressure, in psia, as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 psia.
 - d. The density of the material stored, in pounds per gallon.
 - e. The total throughput of each material, in gallons.
- 2. The permittee shall maintain the following monthly emission information for this emissions unit:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each specific HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. The total emissions of VOC, in tons.
 - b. The total emissions of each individual HAP, in tons.
 - c. The aggregate sum of all HAPs, in tons.
- 4. The permittee shall maintain rolling, 12-month summations for the following:
 - a. The total emissions of VOC from all emissions units at the facility, in tons.
 - b. The total emissions of each individual HAP from all emissions units at the facility, in tons.
 - c. The aggregate sum of all HAPs from all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which document all exceedances of the rolling, 12-month summation limitations contained in A.2.c, d and e.
- 2. The permittee shall submit deviation (excursion) reports which identify all periods when any photochemically reactive material with a vapor pressure of greater than 12.5 psia was stored.
- 3. The permittee shall also submit semi-annual reports which contain the rolling, 12-month summations for each month of the reporting period for individual HAP emissions, aggregate HAP emissions, and total VOC emissions. These reports shall be submitted on January 31 and July 31 of each year and shall cover the previous 6 months of operation.

E. Testing Requirements

1. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in section A.2, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - 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. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 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).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.
2. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
 - a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions; and
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions.
 - b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
 - c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - d. 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 Hamilton County Division of Environmental Services and the Ashland Petroleum Company, Inc.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit to operate are federally enforceable requirements: A-F.