

Facility ID: 0125000276 Issuance type: Final 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.

When the VCU is undergoing routine or emergency maintenance, all gasoline and distillate loading from J001 shall continue to be controlled by another vapor combustion unit (VCU) or other such device capable of achieving the capture and control efficiencies required by this permit .

Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).

The total emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units including permit to install exempt and "de minimis" emissions units at this facility shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month summation of the HAP emissions, and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation of the HAP emissions. These rolling summations 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.

B. Operational Restrictions

1. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline, ethanol and distillates to any delivery vessel:
 - a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system;
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure;
 - c. all vapors collected by the vapor collection system are vented to the vapor control system.
2. The loading rack shall be provided with a means to prevent drainage of gasoline, ethanol and distillates from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
3. The permittee shall not permit gasoline, ethanol or distillates to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
4. All gasoline, ethanol and distillates loading lines and vapor lines shall be equipped with fittings which are vapor tight.

The term "vapor tight" as defined in OAC rule 3745-21-01(H) means free of any vapor leaks to the extent possible based upon good engineering design and practice.
5. Compliance with the annual emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline , distillates and ethanol.

The annual throughputs of gasoline (including gasoline, ethanol, additives and transmix) shall not exceed 304,485,036 gallons.

Compliance with the annual gasoline throughput limitations shall be based upon each rolling 12-month summation of the gasoline throughput quantities.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gasoline throughput.

The annual throughputs of distillate shall not exceed 525,600,000 gallons.

Compliance with the annual diesel throughput limitations shall be based upon each rolling 12-month summation of the diesel throughput quantities.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the diesel throughput.
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 (100%) of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
7. Any tank truck used in conjunction with this emissions unit must comply with the requirements of OAC rule 3745-21-09(V), if applicable.
8. The vapor combustion unit (VCU) shall be kept in good working order and shall be used at all times during the transfer of gasoline, ethanol or distillates into gasoline tank trucks (as defined by 40 CFR 60.501). Any scheduled maintenance of air pollution control equipment shall be performed in accordance with (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system shall be reported to the Ohio EPA Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06.
9. A pilot flame shall be maintained at all times in the flare's pilot light burner during the loading of gasoline, ethanol or distillates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput, in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;

- g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
- h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses, in tons;
- i. the rolling, 12-month summation of VOC emissions from distillate tank truck vapor losses, in tons;
- j. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons;
- k. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.1.g through C.1.j above);
- l. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
- m. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.1.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

- 2. The permittee shall properly operate and maintain a device to continuously monitor the flare's pilot flame when the emissions unit is in operation. The monitoring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. This monitoring device shall include an interlock that prevents the loading of gasoline or distillates when the flare's pilot flame is not operational.
- 3. Each business day, the permittee shall verify that the flare's pilot flame and flame sensor are functioning properly when the emissions unit is in operation. The permittee shall record the results of the daily flare pilot flame and flame sensor inspections.
- 4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- 5. The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

This term applies only during performance testing as referenced in OAC rule 3745-21-10(E)(7) and (8).
- 6. The permittee shall collect and record the following information each day:
 - a. The permittee shall maintain the data required by the "Daily Log", on a daily basis (i.e., Monday through Friday while the operation is manned). The "Daily Log" shall contain information to assess the proper operation of the VOC control device. Any subsequent changes to this "Daily Log" shall be mutually agreeable to the permittee and the Ohio EPA.
 - b. The results of the daily pilot inspections and descriptions of any failures of the flame detection system. If a failure is detected, record the period of time when gasoline was loaded, until the system is repaired.

The permittee shall maintain a log or record of operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- 7. The permittee shall implement, within 90 days of the issuance of this permit, a preventative maintenance program for the VCU which has been approved by the Central District Office. This program shall include an annual inspection for the VCU by a qualified individual. The resultant report shall be maintained on site and shall be made available during subsequent inspection by the Central District Office.

D. Reporting Requirements

- 1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput, in gallons (including gasoline, ethanol, additives and transmix); and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

- 2. Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1. of these term and conditions shall be determined with the following methods:
Emission limitation: VOC emissions from the vapor control system shall not exceed 0.29 pound of VOC per 1,000 gallons (35 mg/l) of gasoline or ethanol loaded into the delivery vessel.

Applicable compliance method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 12 months after issuance of the permit and within 12 months of permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable VOC mass emission limitation of 35 mg per liter of gasoline loaded (0.29 pounds of VOC per 1000 gallons of gasoline loaded) over a minimum of one 6-hour test according to the procedures outlined by OAC rule 3745-21-10(E).
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity as described in 3745-21-10(E)(2), unless otherwise specified or approved by Ohio EPA Central District Office.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. 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 Central District Office's refusal to accept the results of the emission test(s).

v. Personnel from the appropriate Ohio EPA Central District Office 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.

vi. 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 Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Central District Office.

Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.1.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test, divided by 2000 pounds / ton.

ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.1.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.

iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.

v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.

vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.

Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.b.vi above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC

- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.c.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

The total annual VOC emissions for J001 shall not exceed 75.08 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

i. For loading rack VOC emissions when loading gasoline (including gasoline, ethanol, additives and transmix), multiply the rolling, 12-month gasoline throughput from II.C.1.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.

ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.1.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.

iii. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.

iv. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

v. For total load rack VOC emissions, sum i + ii + iii + iv.

Emission limitation: VOC emissions from the vapor control system shall not exceed 0.016 pound of VOC per 1,000 gallons (1.9 mg/l) of diesel loaded into the delivery vessel.

Applicable Compliance Method:

Compliance shall be demonstrated by using the emission factor for Distillate Oil No.2 from AP-42 "Compilation of Air Pollutant Emission Factors", Table 5.2-5 (1/95).

F. Miscellaneous Requirements

- 1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 0125000276 Emissions Unit ID: T001 Issuance type: Final State Permit To Operate

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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> |
|--|---|---|
| One (1) 2,104,339-gallon gasoline storage tank with internal floating roof | OAC rule 3745-21-09(L) OAC rule 3745-35-07 | See A.2 below. The total annual VOC emissions for T001 shall not |

exceed 2.08 tons per year (including fugitive emissions).

Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation.

Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation.

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05). The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface). The annual throughputs of gasoline for all storage tanks shall not exceed 1,567,800,000 gallons.

Compliance with the annual gasoline throughput limitations shall be based upon rolling 12-month summations of the gasoline .

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gasoline throughput.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for this emissions unit of the following information:
- the types of petroleum liquids stored in the tank;
 - the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
2. The permittee shall maintain monthly records of the following information for the entire facility:
- the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - the rolling, 12-month summation of VOC emissions from all loading racks, in tons;
 - the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
 - the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
 - the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
 - the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above); and
 - the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
 - the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.

ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.

iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.

v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.

vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

- i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

Emission limitation: The total annual VOC emissions from T001 shall not exceed 2.08 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.

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

Facility ID: 0125000276 Emissions Unit ID: T002 Issuance type: Final State Permit To Operate

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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> |
|---|---|---|
| One (1) 886,830 gasoline storage tank with internal floating roof | OAC rule 3745-21-09(L) OAC rule 3745-35-07 | See A.2 below. The total annual VOC emissions for T002 shall not exceed 4.50 tons per year (including fugitive emissions). Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation. Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation. Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation. |

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05). The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface). The annual throughputs of gasoline for all storage tanks shall not exceed 1,567,800,000 gallons.

Compliance with the annual gasoline throughput limitations shall be based upon rolling 12-month summations of the gasoline .

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing

records to generate the rolling, 12-month summation of the gasoline throughput.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for this emissions unit of the following information:
 - a. the types of petroleum liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - c. the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
2. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;
 - g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
 - h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
 - i. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
 - j. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above); and
 - k. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
 - l. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

 - i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.
 - ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.
 - iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.
 - iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of

gasoline loaded, divided by 2000 pounds / ton.

v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.

vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

- i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

Emission limitation: The total annual VOC emissions from T002 shall not exceed 4.5 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.

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

Facility ID: 0125000276 Emissions Unit ID: T003 Issuance type: Final State Permit To Operate

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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> |
|--|---|---|
| One (1) 346,668-gallon gasoline storage tank with internal floating roof | OAC rule 3745-21-09(L) OAC rule 3745-35-07 | See A.2 below. The total annual VOC emissions for T003 shall not exceed 5.90 tons per year (including fugitive emissions). Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation. Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation. Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation. |

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof.
 - 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.
 - 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.
 - Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).
 - The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface). The annual throughputs of gasoline shall not exceed 1,576,800 gallons
 - Compliance with the annual gasoline throughput limitations shall be based upon rolling 12-month summations of the gasoline .
 - This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gasoline throughput.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for this emissions unit of the following information:
 - a. the types of petroleum liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - c. the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
2. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;
 - g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
 - h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
 - i. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
 - j. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above);

and

- k. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
- l. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

- 1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.

ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.

iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.

v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.

vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

- i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC

- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.
Emission limitation: The total annual VOC emissions from T003 shall not exceed 5.90 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

- 1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.

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

Facility ID: 0125000276 Emissions Unit ID: T006 Issuance type: Final State Permit To Operate

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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> |
|--|---|---|
| One (1) 1,080,954-gallon gasoline storage tank with internal floating roof | OAC rule 3745-21-09(L) OAC rule 3745-35-07 | See A.2 below. The total annual VOC emissions for T006 shall not exceed 6.28 tons per year (including fugitive emissions). Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation. Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation. Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation. |

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05). The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and

24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface). The annual throughputs of gasoline shall not exceed 1,576,800 gallons

Compliance with the annual gasoline throughput limitations shall be based upon rolling 12-month summations of the gasoline .

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gasoline throughput.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for this emissions unit of the following information:
 - a. the types of petroleum liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - c. the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
2. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;
 - g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
 - h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
 - i. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
 - j. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above); and
 - k. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
 - l. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:
 - i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.

ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.

iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.

v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.

vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.

vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

- i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

Emission limitation: The total annual VOC emissions from T006 shall not exceed 6.28 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.

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

Facility ID: 0125000276 Emissions Unit ID: Z001 Issuance type: Final State Permit To Operate

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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> |
|--|--------------------------------------|---|
| One (1) 2,582,538-gallon diesel storage tank with internal floating roof | OAC rule 3745-21-09(L) | See A.2 below. |
| | OAC rule 3745-35-07 | The total annual VOC emissions for Z001 shall not exceed 2.25 tons per year (including fugitive emissions). |
| | | Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation. |
| | | Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation. |
| | | Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation. |

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof.
 - 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.
 - 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.
 - Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).
 - The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

- 1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of diesel. The annual throughputs of diesel for all storage tanks shall not exceed 1,567,800,000 gallons.
 - Compliance with the annual diesel throughput limitations shall be based upon rolling 12-month summations of the diesel .
 - This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the diesel throughput.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records for this emissions unit of the following information:
 - a. the types of petroleum liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - c. the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
- 2. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;

- g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
- h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
- i. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
- j. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above); and
- k. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
- l. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.l above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

- 1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:
 - i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.
 - ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.
 - iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.
 - iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.
 - v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.
 - vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.
 - vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:
 - i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:
 - (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC

- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

Emission limitation: The total annual VOC emissions from Z001 shall not exceed 2.25 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

- 1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.

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

Facility ID: 0125000276 Emissions Unit ID: Z002 Issuance type: Final State Permit To Operate

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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> |
|--|---|--|
| One (1) 58,371-gallon interface storage tank with internal floating roof | OAC rule 3745-21-09(L) OAC rule 3745-35-07 | See A.2 below. The total annual VOC emissions from Z002 shall not exceed 7.51 tons per year (including fugitive emissions). Facility - wide VOC emissions shall not exceed 99.0 tons per rolling, 12-month summation. Facility - wide individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation. Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation. |

2. Additional Terms and Conditions

- (a) The fixed roof storage tank shall be equipped with an internal floating roof.
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.

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.

Facility-wide emissions shall include emissions units T001-T003, T006, Z001, Z002, J001 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).

The emission of hazardous air pollutants (HAPs) as identified in section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting annual throughputs of gasoline (i.e., gasoline, additives, and interface). The annual throughputs of gasoline for all storage tanks shall not exceed 1,576,800 gallons

Compliance with the annual gasoline throughput limitations shall be based upon rolling 12-month summations of the gasoline .

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gasoline throughput.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for this emissions unit of the following information:
 - a. the types of petroleum liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and
 - c. the calculated, total HAP (individual and combined HAPs) and VOC emissions for each month and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates, in tons.
2. The permittee shall maintain monthly records of the following information for the entire facility:
 - a. the rolling, 12-month summation of all loading rack gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons;
 - b. the rolling, 12-month summation of all loading rack distillate throughput, in gallons;
 - c. the rolling, 12-month summation of all storage tank gasoline throughput, in gallons;
 - d. the rolling, 12-month summation of all storage tank distillate throughput, in gallons;
 - e. the rolling, 12-month summation of all storage tank ethanol throughput, in gallons;
 - f. the rolling, 12-month summation of VOC emissions from all loading racks, in tons;
 - g. the rolling, 12-month summation of VOC emissions from all storage tanks, in tons;
 - h. the rolling, 12-month summation of VOC emissions from gasoline tank truck vapor losses and from distillate tank truck vapor losses, in tons; and
 - i. the rolling, 12-month summation of VOC emissions from fugitive leaks from loading rack and terminal equipment, in tons; and
 - j. the rolling, 12-month summation of facility - wide VOC emissions, in tons (sum of C.2.g through C.2.j above); and
 - k. the rolling, 12-month summation of facility - wide individual HAP emissions for each HAP, in tons; and
 - l. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons (sum of the individual HAP emissions from C.2.i above).

VOC emissions from J001 shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following information:
 - a. the rolling, 12-month summation of facility-wide gasoline throughput (including gasoline, ethanol, additives and transmix), in gallons; and
 - b. the rolling, 12-month summation of facility-wide distillate throughput, in gallons; and
 - c. the rolling, 12-month summation of facility - wide VOC emissions, in tons; and
 - d. the rolling, 12-month summation of facility - wide individual HAP emissions, in tons; and
 - e. the rolling, 12-month summation of facility - wide combined HAP emissions, in tons.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in

accordance with the following methods:

Emission limitation: Facility - wide VOC emissions shall not exceed 99 tons per rolling, 12-month summation.

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined as follows:

- i. For loading rack VOC emissions when loading gasoline, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the VOC emission factor (lb VOC / 1000 gallons of gasoline loaded), calculated based on the results of the most recent emission test for the VCU, divided by 2000 pounds / ton.
 - ii. For loading rack VOC emissions when loading distillates, multiply the rolling, 12-month distillate throughput from II.C.2.b above by the VOC emission factor (lb VOC / 1000 gallons of distillate loaded), calculated using from AP-42 Chapter 5.2-7, Equation 1 (December 1995), divided by 2000 pounds / ton.
 - iii. For total allowable storage tank VOC emissions, determine emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.
 - iv. For total allowable VOC fugitive emissions from gasoline tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.a above by the emission factor of 0.201 lb VOC / 1000 gallons of gasoline loaded, divided by 2000 pounds / ton.
 - v. For total allowable VOC fugitive emissions from distillate tank truck vapor losses, multiply the rolling, 12-month gasoline throughput from II.C.2.b above by the emission factor of 0.00058 lb VOC / 1000 gallons of distillate loaded, divided by 2000 pounds / ton.
 - vi. For total allowable VOC fugitive emissions from loading rack and terminal equipment, determine emissions using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates." in terms of tons of VOC per rolling, 12-month summation.
 - vii. For facility - wide VOC emissions, sum i + ii + iii + iv + v + vi.
- Emission limitation: Facility - wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month summation.

Facility - wide combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month summation

Applicable compliance method: Compliance with the annual allowable HAP limitations above shall be determined as follows:

- i. For individual HAP emissions, multiply the facility-wide VOC emissions from Section E.1.a.vii above by the HAP emission factors obtained from AP-42, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology (11/2006) or the Baseline Distribution Industry (Stage 1) - Background Information for Proposed Standards for the MACT Regulation Table C-5 (EPA-435/R-94-002a).

The specific HAP emission factors are:

- (a) benzene: 18 pounds per ton of gasoline VOC;
0.4 pounds per ton of distillate VOC
- (b) ethylbenzene: 2 pounds per ton of gasoline VOC;
0.8 pounds per ton of distillate VOC
- (c) hexane: 32 pounds per ton of gasoline VOC;
0.2 pounds per ton of distillate VOC
- (d) toluene: 26 pounds per ton of gasoline VOC;
5.2 pounds per ton of distillate VOC
- (e) isooctane: 16 pounds per ton of gasoline VOC;
0.0 pounds per ton of distillate VOC
- (f) xylenes: 10 pounds per ton of gasoline VOC;
13.8 pounds per ton of distillate VOC

ii. For each individual HAP, divide the values in E.1.b.i by 2000 lbs / ton. For combined HAP emissions, sum all of the individual HAP emissions.

Emission limitation: The total annual VOC emissions from Z002 shall not exceed 7.51 tons per year (including fugitive emissions).

Applicable compliance method: Compliance with the annual allowable VOC emission limitation shall be determined by calculating emissions in tons of VOC per rolling, 12-month summation using USEPA's "TANKS" program version 4 or higher or the most recent version of published AP-42 emissions factors.

F. Miscellaneous Requirements

1. The following terms are considered to be federally enforceable: Sections A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.