Facility ID: 1576050275 Issuance type: Draft State Permit To Operate

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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.

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

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Loading rack with carbon adsorption/gasoline absorption vapor recovery unit	OAC Rule 3745-21-09(Q) including but not limited to 3745-21-09(Q)(1)(b)(ii)	Gasoline Loading: 0.67 pound of VOC per 1,000 gallons (80 mg/l) of gasoline loaded into the delivery vessel
	OAC Rule 3745-35-07	Distillate Loading (diesel fuels, fuel oils, and kerosene): 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel; 2.85 tons VOC per year
	OAC Rule 3745-35-07	Gasoline Loading: 79.8 tons VOC per year The total annual VOC emissions from this emissions unit shall not exceed 82.65 tons.
	OAC Rule 3745-35-07	The total annual HAP emissions from this facility shall not exceed 25 tons per year. (See 2.a)
	OAC Rule 3745-35-07	The total annual emissions of any individual HAP from this facility shall not exceed 10 tons per year. (See 2.a)
	OAC Rule 3745-35-07	

2. **Additional Terms and Conditions**

   (a) The emissions [as defined by OAC rule 3745-77-01 (BB)] of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for any single HAP and 25 TPY for any combination of HAPs.

B. **Operational Restrictions**

1. The annual throughput of gasoline and distillates shall not exceed 239,000,000 gallons and 300,000,000 gallons, respectively. In order to ensure federal enforceability during the first twelve calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations:

   Maximum Allowable Cumulative Throughput For:
   Month(s) Gasoline (gallons) Distillates (gallons)
   1 19,925,000 25,000,000
   1-2 39,850,000 50,000,000
   1-3 59,775,000 75,000,000
   1-4 79,700,000 100,000,000
   1-5 99,625,000 125,000,000
   1-6 119,550,000 150,000,000
   1-7 139,948,000 175,000,000
   1-8 159,400,000 200,000,000

1-9 179,330,000 225,000,000
1-10 199,250,000 250,000,000
1-11 219,180,000 275,000,000
1-12 239,000,000 300,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual gasoline and distillates throughput limitations shall be based upon rolling 12-month summations of the gasoline and distillate throughput amounts.

2. The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:

a. All vapors displaced from the gasoline 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.

3. The loading rack shall be equipped with a vapor control system whereby:

a. All vapors collected by the vapor collection system are vented to the vapor control system.

b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

4. 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.

5. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

6. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

7. The permittee shall repair within fifteen days any leak from the vapor collection system and vapor control system which are employed to meet the requirements of paragraph (Q)(1) of rule 3745-21-09 when such leak is equal to or greater than one hundred percent of the lower explosive limit as propane, as determined under paragraph (K) of Rule 3745-21-10 of the Administrative Code.

8. The maximum exhaust gas VOC concentration shall not exceed 4% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 4% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation (80 mg/l), but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.]

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

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

a. The total throughput in gallons of gasoline and distillates for each month.

b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs in gallons of gasoline and distillates for each calendar month.

c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total gasoline and distillates throughputs in gallons.

2. The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit. This recordkeeping shall begin 30 days after the issuance of the permit to operate.

D. **Reporting Requirements**

1. The permittee shall submit semiannual deviation (excursion) reports which identify all exceedances of the following:

a. the rolling, 12-month limitations on the throughput of gasoline and distillates; and

b. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative throughput limits.

These semi-annual written reports shall include the following:

a. an identification of each deviation

b. the probable cause of each deviation,

c. any corrective actions or preventive measures which have been taken or will be taken .

If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period. The reports shall be submitted semiannually, i.e., by February 15 and August 15 of each year and shall address the data obtained during the previous calendar 6-month period (July to December and January to June, respectively).

2. This permittee shall submit an annual report of the total throughput, in gallons, for gasoline and distillates during the calendar year, and the estimated total VOC emissions from this emissions unit. This annual report shall be submitted by February 15 of each year.

3. The permittee shall submit semiannual reports indicating any exceedances of the VOC concentration limit, along with the cause of the exceedance and an explanation of any corrective action taken to prevent a similar exceedance in the future. These semiannual reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous six calendar months (July through December, and January through June, respectively).

E. **Testing Requirements**

1. The emission test methods and procedures are those outlined in OAC Rule 3745-21-10(E), i.e., a minimum of one 6-hour test, during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)

   Within twelve (12) months prior to the expiration of this permit, the permittee shall conduct or have conducted an emission test(s) for this emissions unit in order to demonstrate continuing compliance with the allowable VOC emission rate. This test shall be done between the months of May and September.

   Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton 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 Canton Local Air Agency's refusal to accept the results of the emission test (s).

   Personnel from the Canton 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 Canton Local Air Agency within 30 days following completion of the test(s).

2. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

   Emission Limitation: 0.67 pound VOC per thousand gallons of gasoline loaded
   Applicable Compliance Method: OAC rule 3745-21-10(E)

   Emission Limitation: 0.019 pound VOC per thousand gallons of distillate loaded
   Applicable Compliance Method: Use an emission factor from AP-42 of 0.016 pound of VOC per thousand gallons of kerosene and an emission factor of 0.014 pound of VOC emissions per thousand gallons of distillate.

   Emission Limitation: 79.8 tons VOC/year from gasoline loading
   Applicable Compliance Method: The actual emissions shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2,000.

   Emission Limitation: 2.85 tons VOC/year from distillate loading
   Applicable Compliance Method: The actual emissions shall be calculated as the product of 0.019 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2,000.

   Emission Limitation: 10 TPY for any single HAP and 25 TPY for any combination of HAPs.
   Applicable Compliance Method: For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for the year (in TPY) for all emission units at the facility:

   hexane - 0.016 pound of hexane emissions per pound of VOC;
   benzene - 0.009 pound of benzene emissions per pound of VOC;
   toluene - 0.013 pound of toluene emissions per pound of VOC;
   2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
   xylenes - 0.005 pound of xylene emissions per pound; and
   ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.
   For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

F. **Miscellaneous Requirements**

1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms & conditions of this PTO are federally enforceable requirements.