Facility ID: 1677120030 Issuance type: Draft State Permit To Operate

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

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

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

Go to Part II for Emissions Unit J001
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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
J001 - petroleum loading rack with three bays, fourteen loading arms, and a vapor recovery unit (The terms in PTI 16-02104 supersede the terms in PTI 16-1771 issued on May 6, 1998.)	OAC rule 3745-31-05(A)(3) (PTI 16-02104)	68.35 pounds of total organic compounds (TOC) per hour from the vapor collection system The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q), OAC rule 3745-35-07, and 40 CFR Part 60, Subpart XX. The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to 40 CFR Part 60, Subpart XX. See A.2.a through A.2.d below.
	OAC rule 3745-21-09(Q)	Combined annual emissions from all facility emissions units shall not exceed the following, as rolling, 12-month summations: 95.0 tons of volatile organic compounds (VOC); 24.0 tons of total combined hazardous air pollutants (HAPs); and 9.0 tons of any individual HAP.
	OAC rule 3745-35-07	The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 mg of TOC per liter of gasoline loaded.
	40 CFR Part 60, Subpart XX	

2. **Additional Terms and Conditions**

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

i. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and

ii. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
The loading rack shall be equipped with a vapor control system whereby:

i. all vapors collected by the vapor collection system are vented to the vapor control system; and

ii. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
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.
All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

B. **Operational Restrictions**

1. 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.

2. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

3. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

4. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using all of the following procedures:

   a. The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility.

   b. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded.

   c. The permittee shall cross-check each tank identification number, obtained in accordance with section B.4.b of this permit, with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained.

   i. if less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

   ii. if less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

   If either the quarterly or semiannual cross-check provided in section B.4.c.i or B.4.c.ii of this permit reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.

   d. The terminal owner or operator shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded within 1 week of the document cross-check in section B.4.c of this permit.

   e. The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be re-loaded until vapor tightness documentation for that tank is obtained.
   f. Alternate procedures to those described in sections B.4.a through B.4.e of this permit for limiting gasoline tank truck loadings may be used upon application to, and approval by, Akron Regional Air Quality Management District (Akron RAQMD).

5. The permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

6. The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks.

7. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 Pascal (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in section 60.503(d) of 40 CFR Part 60.

8. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

9. The following vapor recovery unit (VRU) parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:

   a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;

   b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;

   c. to ensure a proper flow of gasoline to the absorber nozzle when the vapor recovery unit is operating, a differential pressure of 59 inches of water column or greater shall be maintained across the orifice plate, located in the gasoline supply line to the absorber tower nozzle; and

   d. to ensure proper adsorption, the carbon bed temperatures, at all levels, shall not exceed 150 degrees F.

Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation.

10. 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) and distillates (i.e., kerosene and diesel fuel). The annual throughputs of gasoline and distillates shall not exceed 491,503,051 gallons and 349,456,948 gallons, respectively, based upon rolling, 12-month summations of the throughputs.

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

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

   a. the total, individual throughputs of gasoline and distillates, in gallons;

   b. the rolling, 12-month summations of the total individual throughputs of gasoline and distillates, in gallons; and

   c. the calculated, total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates for all emissions units at the facility, in tons.

2. The permittee shall implement a preventive maintenance program (PMP) for the McGill VRU which has been submitted to the Akron RAQMD. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspection by the Akron RAQMD.

3. The permittee shall maintain the data required by the "McGill Daily Operating Check Sheet" on a daily basis, Monday through Friday excluding holidays. The permittee shall submit any subsequent changes to this check sheet to Akron RAQMD within 30 days prior to implementing these changes. The changes to this check sheet shall be mutually agreeable to CITGO Petroleum Corporation and Akron RAQMD.

4. The permittee shall collect and record the following information for each day, Monday through Friday excluding holidays:

   a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

   b. during the regeneration cycle, the vacuum pressure in inches of Hg;

   c. the gasoline supply temperature in degrees F;

   d. the differential pressure across the orifice plate in inches of water column;

   e. the carbon bed temperatures in degrees F; and

   f. the pressure in the vapor collection system, in inches of water gauge pressure.

5. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

6. The tank truck vapor tightness documentation required under section B.4.a of this permit shall be kept on file at the terminal in a permanent form available for inspection.

7. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information:

   a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27);

   b. tank owner and address;

   c. tank identification number;

   d. testing location;

   e. date of test;

   f. tester name and signature;

   g. name, signature, and affiliation of witnessing inspector, if any; and

   h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

8. A record of each monthly leak inspection required under section C.5 of this permit shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

   a. date of inspection;

   b. findings (may include no leak(s) discovered, or the location, nature and severity of leak(s));

   c. leak determination method;

   d. corrective action taken, including the date each leak was repaired and the reason for any repair interval in excess of 15 days; and

e. inspector name and signature.

9. The permittee shall keep documentation of all notifications required under section B.4.d of this permit on file at the terminal for at least 2 years. The permittee shall also keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

10. The permit to install for this emissions unit (J001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: gasoline vapor

TLV (mg/m3): 890
Maximum Hourly Emission Rate (lbs/hr): 22.78*
Predicted 1 Hour Maximum Ground-Level
Concentration at the Fence line (ug/m3): 15,780
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 21,190.5

Pollutant: methyl tert-butyl ether (MTBE)

TLV (mg/m3): 144
Maximum Hourly Emission Rate (lbs/hr): 1.59*
Predicted 1 Hour Maximum Ground-Level
Concentration at the Fence line (ug/m3): 1100
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3428.6

Pollutant: hexane

TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.36*
Predicted 1 Hour Maximum Ground-Level
Concentration at the Fence line (ug/m3): 275
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4190.48

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.30*
Predicted 1 Hour Maximum Ground-Level
Concentration at the Fence line (ug/m3): 220
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476.19

*Increase in emission rate.
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel throughput limitations for gasoline and distillates.

5. The permittee shall submit quarterly deviation (excursion) reports that identify all parameter readings that are outside of the acceptable value for each VRU key operating parameter established in section B.9 above. The report shall include a written description of why the unacceptable reading occurred, and an explanation of any action taken or required to correct the unacceptable reading.

6. The permittee shall submit quarterly pressure deviation (excursion) reports that identify all periods of time during which the pressure in the vapor collection system did not comply with the allowable range of minus 6 to plus 18 inches of water gauge pressure specified in section A.2.a.ii above.

7. The permittee shall notify Akron RAQMD in writing of each monthly record indicating that a leak was not repaired within 15 days. The notification shall include a copy of such record and shall be sent to Akron RAQMD within 30 days after the leak was discovered.

8. The permittee shall submit annual reports that specify the following:

   a. VOC, total combined HAPs, and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

   b. actual throughput levels for gasoline and distillates, in gallons, for J001.

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

E. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emission unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 12 months after the effective date of this permit and within 12 months prior to permit expiration, during the summer months when the gasoline vapor pressure is highest.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of total organic compounds from gasoline loading.

   c. The following test methods and procedures of 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable mass emission rate for TOC:

   Method 2A inlet vapor volume
   Method 21 potential leak sources
   Method 25A or 25B TOC concentration
   Subpart XX [60.503(d)] tank truck maximum pressure

   Testing shall be performed in accordance with the requirements of 40 CFR 60.503 and OAC rule 3745-21-10 (E).

   d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission 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 Akron RAQMD's refusal to accept the results of the emission test(s).

3. Personnel from the Akron RAQMD 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 testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. 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 Akron RAQMD within 30 days following completion of the test(s).

5. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
   Emission Limitation

   35 mg of TOC per liter of gasoline loaded

   Applicable Compliance Method

   Compliance with the allowable mass emission rate for TOC shall be determined through emission testing as required in sections E.1 through E.4 of these terms and conditions.
   Emission Limitation

   68.35 pounds of TOC per hour from the vapor collection system

   Applicable Compliance Method

   To demonstrate compliance, the permittee may multiply the allowable emission rate of 35 mg of TOC per liter of

gasoline loaded by the maximum liters of gasoline load per hour. In addition, compliance with the allowable mass emission rate for TOC shall be determined through emission testing as required in sections E.1 through E.4 of these terms and conditions.
Emission Limitation

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility-supplied emission factors as follows:

For Gasoline:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of 2,2,4-trimethylpentane emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards" EPA-453/R-94-002a, dated January 1994.

For Distillates:

i. benzene - 0.22 pound of benzene emissions per pound of VOC emissions
ii. cumene - 0.004 pound of cumene emissions per pound of VOC emissions
iii. ethyl benzene - 0.02 pound of ethyl benzene emissions per pound of VOC emissions
iv. hexane - 0.18 pound of hexane emissions per pound of VOC emissions
v. toluene - 0.12 pound of toluene emission

Emission factors are derived from using the speciation option of USEPA's "Tanks" program.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

F. **Miscellaneous Requirements**

1. The following terms and conditions are considered to be federally enforceable: Sections A, B, C.1 through C.9, 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.

Facility ID: 1677120030 Emissions Unit ID: T001 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
522,522-gallon storage tank with internal floating roof	OAC rule 3745-21-09(L)	See A.2 below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

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.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain records 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; 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 for all emissions units at the facility for each month, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

   a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

   b. actual throughput levels of gasoline and distillates, in gallons, for J001.

   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

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

Facility ID: 1677120030 Emissions Unit ID: T002 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
521,388-gallon storage tank with internal floating roof	OAC rule 3745-21-09(L)	See A.2 below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

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.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain records 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; 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 for all emissions units at the facility for each month, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

b. actual throughput levels of gasoline and distillates, in gallons, for J001.

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

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December

15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

Facility ID: 1677120030 Emissions Unit ID: T003 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
1,198,134-gallon storage tank with internal floating roof	OAC rule 3745-21-09(L)	See A.2 below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

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.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain records 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; 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 for all emissions units at the facility for each month, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

b. actual throughput levels of gasoline and distillates, in gallons, for J001.

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

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions

iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

Facility ID: 1677120030 Emissions Unit ID: T004 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
1,226,316-gallon storage tank with internal floating roof	OAC rule 3745-21-09(L)	See A.2 below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

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.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain records 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; 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 for all emissions units at the facility for each month, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

   a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

   b. actual throughput levels of gasoline and distillates, in gallons, for J001.

   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

   95 tons per year of VOC for the entire facility

   Applicable Compliance Method

   Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

   In order to calculate the VOC emission rates, the permittee shall comply with the following:

   i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

   ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

   iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

   iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

   v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
   Emission Limitations

   24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

   Applicable Compliance Method

   Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

   The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

   i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
   ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
   iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
   iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
   v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
   vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
   vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

   Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
   Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

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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
94,752-gallon storage tank with internal floating roof	OAC rule 3745-21-09(L)	See A.2 below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

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.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain records 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 that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; 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 for all emissions units at the facility for each month, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

   a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

   b. actual throughput levels of gasoline and distillates, in gallons, for J001.

   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

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

Facility ID: 1677120030 Emissions Unit ID: T007 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
7,761-gallon fixed roof storage tank	OAC rule 3745-31-05 (PTI 16-1029)	0.02 pound of volatile organic compounds (VOC) per hour
	OAC rule 3745-21-09(L)(2)(a)	none
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain monthly records of the calculated, total HAP (individual and combined HAPs) and VOC emissions for and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from gasoline and distillates for all emissions units at the facility, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

b. actual throughput levels of gasoline and distillates, in gallons, for J001.

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

0.02 pound of VOC per hour

Applicable Compliance Method

Compliance with the hourly VOC emission rate shall be determined using the most recent version of USEPA's "Tanks" program.
Emission Limitation

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a

collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.
Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.1 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
v. toluene - 0.013 pound of toluene emissions per pound of VOC emissions
vi. xylene - 0.005 pound of xylene emissions per pound of VOC emissions
vii. 2,2,4-trimethylpentane - 0.008 pound of xylene emissions per pound of VOC emissions

Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.

Facility ID: 1677120030 Emissions Unit ID: T009 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
3,062,818-gallon storage tank with internal floating roof	OAC rule 3745-31-05 (PTI 16-1604)	8.01 tons of volatile organic compounds (VOC) per year
	OAC rule 3745-21-09(L)	The requirements specified by this rule are equivalent to or less stringent than the requirements established pursuant to 40 CFR Part 60, subpart Kb.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of volatile organic compounds (VOC); 24 tons of combined hazardous air pollutants (HAP);

and
9.0 tons of any individual HAP.

See A.2.a below.

40 CFR Part 60, Subpart Kb

2. **Additional Terms and Conditions**

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

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

B. **Operational Restrictions**

1. None

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

1. For the control equipment required to meet section A.2.a of this permit (permanently affixed roof and internal floating roof), the permittee shall:

a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this term and condition cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 60.115b(a)(3). Such a

request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

c. For vessels equipped with a double-seal system as specified in section A.2.a.ii(b) of this permit:

i. visually inspect the vessel as specified in paragraph (d) of this term and condition at least every 5 years; or
ii. visually inspect the vessel as specified in paragraph (b) of this term and condition.

d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this term and condition exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (b) and (c)(ii) of this term and condition and at intervals no greater than 5 years in the case of vessels specified in paragraph (c)(i) of this term and condition.

2. The permittee shall keep a record of each inspection performed as required by section C.1 of this permit. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. The permittee shall maintain records of the following information:

a. the volatile organic liquid (VOL) stored in the tank;

b. the period of storage;

c. the maximum true vapor pressure of the VOL during the respective storage period; and

d. 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 for all emissions units at the facility for each month, in tons.

4. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage vessel.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

4. The permittee shall submit annual reports that specify the following:

a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004, T005, T007, and T009; and

b. actual throughput levels of gasoline and distillates, in gallons, for J001.

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

5. Notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by sections C.1.a and C.1.d of this permit to afford the Director the opportunity to have an observer present. If the inspection required by section C.1.d of this permit is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Director at least 7days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Director at least 7 days prior to the refilling.

6. After installing control equipment in accordance with section A.2.a of this permit (fixed roof and internal floating roof), the permittee shall furnish the Director with a report that describes the control equipment and certifies that the control equipment meets the specifications of sections A.2.a and C.1.a of this permit. This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).

7. If any of the conditions described in section C.1.b of this permit are detected during the annual visual inspection required by section C.1.b of this permit, a report shall be furnished to the Director within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

8. After each inspection required by section C.1.c of this permit that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in section C.1.c.ii of this permit, a report shall be furnished to the Director within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of section A.2.a or C.1.c of this permit and list each repair made.

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

8.01 tons of VOC per year

Applicable Compliance Method

Compliance with the annual VOC emission rate shall be determined using the most recent version of USEPA's "Tanks" program.

Emission Limitation

95 tons per year of VOC for the entire facility

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1 above.

In order to calculate the VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from the oil water separator shall be based upon the emission factors provided in AP-42, Fifth Edition, Table 5.1-2.

iv. The VOC emissions from gasoline truck loading shall be determined, using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

v. The VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Section 5.2, Equation (1), dated January 1995.

Emission Limitations

24 tons per year of combined HAPs for the entire facility and 9.0 tons per year of any individual HAP for the entire facility

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the records required pursuant to Section C.3 above.

The permittee shall calculate the individual and combined HAP emission rates for this facility using the actual total VOC emissions and the facility supplied emission factors as follows:

i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions
ii. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions
iii. hexane - 0.016 pound of hexane emissions per pound of VOC emissions
iv. methyl tert-butyl ether (MTBE) - 0.07 pound of MTBE emissions per pound of VOC emissions
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Emission factors are referenced from "Gasoline Distribution Industry (Stage I) - Background Infromation for Proposed Standards" EPA-453/R-94-002a, January 1994.
Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron RAQMD, and the CITGO Petroleum Corporation.

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.