State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

11/18/2008

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No	MODELING SUBMITTED

Mike Churchill
TEPPCO Lebanon Terminal
71-73 Denison Parkway
Corning, NY 14830

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1483060110
Permit Number: 14-06044
Permit Type: Initial Installation
County: Warren

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Hamilton County Dept. of Environmental Services

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install
for
TEPPCO Lebanon Terminal

Facility ID: 1483060110
Permit Number: 14-06044
Permit Type: Initial Installation
Issued: 11/18/2008
Effective: 11/18/2008

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
TEPPCO Lebanon Terminal

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Authorization

Facility ID: 1483060110
Facility Description: Gasoline, diesel, and jet fuel transporation, storage, and loading facility.
Application Number(s): A0011351, A0035562
Permit Number: 14-06044
Permit Description: Installation of a convection heater and storage tanks for the fractionation of pipeline products.
Permit Type: Initial Installation
Permit Fee: $2,450.00
Issue Date: 11/18/2008
Effective Date: 11/18/2008

This document constitutes issuance to:

TEPPCO Lebanon Terminal
TEPPCO Lebanon Terminal
2700 Hart Road
Lebanon, OH 45036

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: 14-06044
Permit Description: Installation of a convection heater and storage tanks for the fractionation of pipeline products.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P002**
Company Equipment ID:	Fractionator
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T024**
Company Equipment ID:	3365
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T025**
Company Equipment ID:	3366
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T026**
Company Equipment ID:	3367
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Hamilton County Dept. of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Hamilton County Dept. of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Hamilton County Dept. of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted

(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum,

the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days

after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Hamilton County Dept. of Environmental Services must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb: T024 and T025. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. P002, Fractionator

Operations, Property and/or Equipment Description:

6000 bbl/day fractional distillation of transmix into component fuels; fractionation heater, smokeless maintenance flare, fugitive emissions from seals, valves & flanges

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the fractionation heater stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	The maximum allowable particulate emissions for the fuel burning equipment fired with only gaseous fuels (excluding blast furnace gas) shall be 0.020 pound per million Btu of actual heat input
d.	OAC rule 3745-21-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, SO2, VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than 10 tons/yr.

b. The permittee satisfies the “best available control techniques and operating practices” required pursuant to OAC rule 3745-21-08(B) since the design of the emissions unit and the technology associated with the current operating practices ensures the uncontrolled potential to emit of CO is less than 10 tons/yr.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust emissions;

c. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

d. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Emissions Limitations

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, SO2 and VOC emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than 10 tons/yr.

Applicable Compliance Methods

The uncontrolled potential to emit NOX, CO, SO2, VOC and PE emissions from the combustion of natural gas in the fractionation heater based on the maximum fuel consumption and emission factors from AP-42, Fifth Ed., Chapter 1.4, Natural Gas Combustion, 7/98, as submitted in PTI application 14-06044, April 2008:

16,700 cubic feet nat. gas/hr x 1 MM cubic feet nat. gas/1EE6 cubic feet nat. gas x 100 lbs NOx/MM cubic feet nat. gas x 8760 hr/yr x 1 Ton/2000 lbs = 7.31 TPY NOx

16,700 cubic feet nat. gas/hr x 1 MM cubic feet nat. gas/1EE cubic feet nat. gas x 84 lbs CO/MM cubic feet nat. gas x 8760 hr/yr x 1 Ton/2000 lbs = 6.14 TPY CO

16,700 cubic feet nat. gas/hr x 1 MM cubic feet nat. gas/1EE6 cubic feet nat. gas x 0.6 lb SO2/MM cubic feet nat. gas x 8760 hr/yr x 1 Ton/2000 lbs = 0.04 TPY SO2

16,700 cubic feet nat. gas/hr x 1 MM cubic feet nat. gas/1EE6 cubic feet nat. gas x 8.7 lbs VOC/MM cubic feet nat. gas x 8760 hr/yr x 1 Ton/2000 lbs = 0.64 TPY VOC

16,700 cubic feet nat. gas/hr x 1 MM cubic feet nat. gas/1EE6 cubic feet nat. gas x 7.6 lbs PE/MM cubic feet nat. gas x 8760 hr/yr x 1 Ton/2000 lbs = 0.56 TPY PE

The uncontrolled potential to emit VOC emissions from the purging of process gas from the fractionator (gasoline vapors as pentane) based on air density at 15 deg. C and pentane relative vapor density equal to 2.5:

150 cubic feet pentane/hr x 0.0763 lb air/cubic feet air x [2.5 lb pentane/cubic foot pentane / lb air/cubic foot air] x 24 hr/yr x 1 Ton/2000 lbs = 0.34 TPY VOC

The uncontrolled potential to emit VOC emissions from pump seals, valves and flanges from the fractionator based on the emissions factors from "Protocol for Equipment Leaks Emission Estimates", EPA-453/R-95-017, 11/95, Table 2.3, marketing terminal average emission factors:

4.5EE-05 Kg VOC/hr/valve in light liquid service x 2.2 lbs/Kg x 8760 hr/yr x 700 valves x 1 Ton/2000 lbs = 0.29 TPY VOC

8.0EE-06 Kg VOC/hr/flange in light liquid service x 2.2 lbs/Kg x 8760 hr/yr x 1400 flanges x 1 Ton/2000 lbs = 0.11 TPY VOC

5.4EE-04 Kg VOC/hr/ pump seal in light liquid service x 2.2 lbs/Kg x 8760 hr/yr x 15 pump seals x 1 Ton/2000 lbs = 0.08 TPY VOC

The total summary uncontrolled potential to emit from emissions unit P002:

7.31 TPY NOx

6.14 TPY CO

0.04 TPY SO2

0.64 TPY VOC + 0.34 TPY VOC + 0.29 TPY VOC + 0.11 TPY VOC + 0.08 TPY VOC = 1.46 TPY VOC

0.56 TPY PE

[OAC rule 77-07(A)(3)(c)]

(2) Emission Limitation

Visible particulate emissions from the fractionation heater stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

(3) Emission Limitation

The maximum allowable particulate emissions (PE) for the fuel burning equipment fired with only gaseous fuels (excluding blast furnace gas) shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method

According to AP 42, fifth Ed., Chapter 1.4, Table 1.4-2, the particulate matter (PM) emission factor from natural gas combustion is 7.6 pounds PM (total)/10^6 scf. Dividing this emission factor by the average gross heating value of natural gas (1020 Btu/scf)

gives an emission factor of 0.0075 lb PM/mmBtu, which is less than the maximum allowable of 0.020 lb PE/mmBtu.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

g) Miscellaneous Requirements

(1) None.

2. T024, 3365

Operations, Property and/or Equipment Description:

10000 bbl (420,000 gallon) IFR tank storing petroleum liquid (gasoline)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC emissions is less than 10 tons/yr taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof under OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2) & e)(1).
c.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b) [In accordance with 40 CFR 60.112b, this emissions unit is a storage vessel with a design capacity greater than or equal to 151 m3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa]	Comply with the requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications outlined. [40 CFR 60.112b(a)(1)]

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and/or covers as follows:

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

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

c. The rim vents, if present, shall be set to open or at the manufacturer=s recommended setting when the roof is being floated off the roof leg supports.

d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

[OAC rule 3745-21-09(L)(1)]

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[OAC rule 3745-21-09(L)(3)]

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

[OAC rule 3745-21-09(L)(1)(b) and (c) and (L)(4)]

(3) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

[OAC rule 3745-21-09(L)(4)

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

f) Testing Requirements

(1) Emissions Limitation

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC emissions is less than 10 tons/yr taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof under OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.

Applicable Compliance Method

The potential to emit VOC emissions from the storage vessel, taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof, are less than 10 tons/yr based on the calculations outlined in the Tanks 4.0.9d software, as submitted in PTI application 14-06044, April 2008.

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

g) Miscellaneous Requirements

(1) None.

3. T025, 3366

Operations, Property and/or Equipment Description:

10000 bbl (420,000 gallon) IFR tank storing petroleum liquid (gasoline)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC emissions is less than 10 tons/yr taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof under OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-21-09(L)	See c)(1), d)(1), d)(2) & e)(1).
c.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b) [In accordance with 40 CFR 60.112b, this emissions unit is a storage vessel with a design capacity greater than or equal to 151 m3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa]	Comply with the requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications outlined. [40 CFR 60.112b(a)(1)]

(2) Additional Terms and Conditions

a. None

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and/or covers as follows:

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

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

c. The rim vents, if present, shall be set to open or at the manufacturer=s recommended setting when the roof is being floated off the roof leg supports.

d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

[OAC rule 3745-21-09(L)(1)]

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[OAC rule 3745-21-09(L)(3)]

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

[OAC rule 3745-21-09(L)(1)(b) and (c) and (L)(4)]

(3) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

[OAC rule 3745-21-09(L)(4)

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

f) Testing Requirements

(1) Emissions Limitation

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC emissions is less than 10 tons/yr taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof under OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.

Applicable Compliance Method

The potential to emit VOC emissions from the storage vessel, taking into account the federally enforceable rule requirement to equip the storage vessel with a fixed roof in combination with an internal floating roof, are less than 10 tons/yr based on the calculations outlined in the Tanks 4.0.9d software, as submitted in PTI application 14-06044, April 2008.

(2) See 40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)

g) Miscellaneous Requirements

(1) None.

4. T026, 3367

Operations, Property and/or Equipment Description:

10000 bbl (420,000 gallon) Fixed Roof Storage Tank storing diesel fuel

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons/yr.
b.	OAC rule 3745-21-09(L) [In accordance with OAC rule 3745-21-09(L)(1), this emissions unit is a fixed roof tank storing a petroleum liquid with a true vapor pressure less than 1.52 psi.]	Control measures not applicable based on vapor pressure of petroleum liquid stored. See b)(2)a., d)(1) & e)(1)

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

[OAC rule 3745-21-09(L)(1)]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[OAC rule 3745-21-09(L)(3)]

e) Reporting Requirements

(1) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.

[OAC rule 3745-21-09(L)(4)]

f) Testing Requirements

(1) <u>Emissions Limitation</u>

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons/yr.

<u>Applicable Compliance Method</u>

The uncontrolled potential to emit VOC emissions from the storage vessel are less than 10 tons/yr based on the calculations outlined in the Tanks 4.0.9d software, as submitted in PTI application 14-06044, April 2008.

g) Miscellaneous Requirements

(1) None.