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Facility Name: **CITGO Petroleum Corporation-Tallmadge Terminal**

Application Number: **16-1771**

Date: **May 6, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Citgo Petroleum Corporation-Tallmadge Terminal** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
J001 (Mod)	Petroleum loading rack with two bays, nine loading arms and a vapor recovery unit with 99.4 percent design control efficiency	Compliance with the New Source Performance Standards for bulk gasoline terminals and the use of 99.4 percent efficient vapor recovery unit.	3745-31-05 40 CFR 60 Subpart XX 3745-35-07 3745-21-09 (Q)	35 mg of total Organic Compounds per liter of gasoline loaded Combined annual emissions from all emissions units at this facility shall not exceed the following as a rolling 12-month summation: 95.0 tons per year Organic Compounds 24.0 tons per

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
year Hazardous Pollutants				
9.0 tons per year any individual				
hazardous air pollutant				

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
*Organic Compounds	31.5
Gasoline Vapors	21.0
Benzene	1.1

* Includes the emission of all Organic Compounds listed.

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

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<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T001	9-arm loading rack	XX

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Akron Regional Air Quality**
146 South High Street, Room 904
Akron, OH 44308

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person

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responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

Pollutant(s)

T001

VOC

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Regional Air Quality, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be

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accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Emissions Limitations

1. The combined annual emissions from all emissions units at this facility shall not exceed the following as a rolling 12 month summation:
 - a. 95 tons per year organic compounds;
 - b. 24 tons per year any combination of hazardous air pollutants (HAPs); and
 - c. 9 tons per year any individual hazardous air pollutant.
2. The permittee shall not emit more than 35 mg of total organic compounds per liter of gasoline loaded.
3. 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 § 60.503(d).

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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. Compliance with the emission limitations as stated above shall be achieved by restricting annual throughput of gasoline (i.e., gasoline, additives, and interface) and distillates (i.e., kerosene and diesel fuel). The annual throughput of gasoline and distillates shall not exceed 217,173,275 gallons and 203,306,725 gallons, respectively.
3. Any tank truck used in conjunction with this emissions unit must comply with the requirements of OAC rule 3745-21-09(V), if applicable.
4. The vapor recovery unit (VRU) shall be kept in good working order and shall be used at all times during the transfer of gasoline or distillates into gasoline tank trucks (as defined by 40 CFR 60.501). Transfer of gasoline or distillate into gasoline tank trucks without vapor controls is prohibited. Approval to load without vapor controls during malfunction or scheduled maintenance of the VRU will require prior approval of the Akron RAQMD in accordance with OAC rule 3745-15-06, "Malfunction or equipment; scheduled maintenance; reporting."
5. The following VRU parameters have been identified as key operating parameters for which acceptable operating ranges will be established, based on an emissions test that demonstrates the emissions unit is in compliance.
 - a. the maximum vacuum pulled during the regeneration cycle;
 - b. to ensure proper absorption by the absorption tower, the gasoline supply temperature;
 - c. to ensure a proper flow rate from the absorption tower to the carbon bed, the absorber pressure; and,

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- d. to ensure proper adsorption, the carbon bed temperatures.

C. BAT Determination

1. Compliance with 40 CFR 60 Subpart XX, New Source Performance Standards for bulk gasoline terminals, and the installation and use of Vapor Recovery Unit (VRU) with a designed control efficiency of 99 percent or better.

D. Recordkeeping

1. The permittee shall collect and record the following information as required by 40 CFR 60 Subpart XX:

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- a. the tank truck vapor tightness documentation required under § 60.502(e)(1) of 40 CFR 60 Subpart XX shall be kept on file at the terminal in a permanent form available for inspection;
- b. the documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:
 - i. test title: Gasoline Delivery Tank Pressure Test— EPA Reference Method 27;
 - ii. tank owner and address;
 - iii. tank identification number;
 - iv. testing location;
 - v. date of test;
 - vi. tester name and signature;
 - vii. witnessing inspector, if any: Name, signature, and affiliation; and,
 - viii. test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs);
- c. a record of each monthly leak inspection required under § 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:
 - i. date of inspection;
 - ii. findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
 - iii. leak determination method;

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- iv. corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days); and,
 - v. inspector name and signature;
- d. the terminal owner or operator shall keep documentation of all notifications required under § 60.502(e)(4) of 40 CFR 60 Subpart XX on file at the terminal for at least 2 years; and,
 - e. the owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.
2. The permittee shall maintain monthly records of the following information:
- a. the total, individual throughput of gasoline and distillates, in gallons;
 - b. the cumulative, individual throughput of gasoline and distillates, in gallons, for each calendar month during the first 12-months of operation following the issuance of this permit;
 - c. beginning after the first 12-months of operation following the issuance of this permit, the rolling, 12-month summations of the total individual throughput of gasoline and distillates, in gallons; and,
 - d. the calculated, total HAP (individual and combined HAPs) and VOC emissions and 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.
3. The permittee shall implement, within 90 days of the issuance of this permit and the installation of the new VRU, a preventive maintenance program (PMP) for the VRU which has been approved by the Akron RAQMD. The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and

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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.

4. The permittee shall collect and record the following information for each day for the control equipment:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the gasoline supply temperature in degrees Fahrenheit;
 - d. the absorber pressure in psi; and,
 - e. the carbon bed temperatures in degrees Fahrenheit.

E. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for each individual HAP.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel throughput limitations for gasoline and distillates and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative throughput limitations.

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5. The permittee shall submit deviation (excursion) reports which identify any parameter readings that are outside of the acceptable value for each VRU key operating parameter established in Section B.6 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 annual reports which specify the following:
 - a. VOC, total HAPs and individual HAP emissions, in tons, for J001, T001, T002, T003, T004 and T005; 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.

F. COMPLIANCE DETERMINATION

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

- a. **Emission Limitation**

35 mg of total of total organic compounds per liter of gasoline loaded.

Applicable Compliance Method

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

- i. the emission testing shall be conducted within 90 days from the issuance of this permit and within 12 months prior to permit renewal during the summer months when the gasoline vapor pressure is highest;

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- ii. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC;
- iii. the following test methods and procedures from 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable VOC mass emission rate(s):

Method 2A	inlet vapor volume
Method 21	potential leak sources
Method 25B	inlet and outlet VOC concentration
Subpart XX	
[60.503(a)-(d)]	tank truck maximum pressure

- iv. 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;
- v. the VRU parameters shall be recorded during the test, in a manner acceptable to the Akron RAQMD, to verify continued acceptability; and,
- vi. 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).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment and acquire data and

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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.

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).

The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = \frac{K \sum (V_{ei} C_{ei})}{L \cdot 10^6} \quad I = 1$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{ei} = volume of air-vapor mixture exhausted at each interval "I", scm.

C_{ei} = concentration of total organic compounds at each interval "I", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.
I = emission testing interval of 5 minutes.

K = density of calibration gas, 1.83 × 10⁻⁶ for propane and 2.41 × 10⁻⁶ for butane, mg/scm.

b. Emission Limitation

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The delivery tank gauge pressure shall not exceed 4,500 Pascal (450 mm of water) during product loading.

Applicable Compliance Method

Immediately before the performance test required to determine compliance with § 60.502 (b), (c), and (h), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

The owner or operator shall determine compliance with the standard in § 60.502(h) as follows:

- i. a pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with plus or minus 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck; and,
- ii. during the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

c. Emission Limitation:

95 tons per year of VOC for the entire facility

Applicable Compliance Method

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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 the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5 percent as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4); and,
- v. the VOC emissions from distillate loading shall be determined using AP-42, Fifth Edition, Equation 5.2-1.

d. Emission Limitations

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

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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 - 0.0075306 pound of benzene emissions per pound of VOC emissions;
- ii. ethyl benzene - 0.0004673 pound of ethyl benzene emissions per pound of VOC emissions;
- iii. hexane - 0.0088215 pound of hexane emissions per pound of VOC emissions;
- iv. methyl tertbutyl ether (MTBE) - 0.0603152 pound of MTBE emissions per pound of VOC emissions;
- v. toluene - 0.0031362 pound of toluene emissions per pound of VOC emissions;
- vi. xylene - 0.0012151 pound of xylene emissions per pound of VOC emissions;
- vii. biphenyl - 0.0296140 pound of biphenyl emissions per pound of VOC emissions;
and,
- viii. naphthalene - 0.0495713 pound of naphthalene emissions per pound of VOC emissions

These emission factors are based on the weight percent of each HAP in gasoline and distillate as taken from the facility's MSDS sheets.

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G. Ohio Air Toxics Policy

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1375. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the glycol ether, toluene and methyl ethyl ketone emission limitation(s) specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Gasoline Vapor

TLV (ug/m3): 300

Maximum Hourly Emission Rate (lbs/hr): 4.8

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 3,752

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 7,142.9

Pollutant: Benzene

TLV (ug/m3): 32

Maximum Hourly Emission Rate (lbs/hr): 0.24

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 195.5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 761.9

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron

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Regional Air Quality are required, including the possible issuance of modifications to PTI number 16-1375:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).