



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

6/2/2009

Mrs. LeAnne Funke
BP Oil Company - Dayton Terminal
1927 Gageville Road
Ashtabula, OH 44004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857040266
Permit Number: P0092674
Permit Type: Renewal
County: Montgomery

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

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

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: RAPCA

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
BP Oil Company - Dayton Terminal**

Facility ID: 0857040266
Permit Number: P0092674
Permit Type: Renewal
Issued: 6/2/2009
Effective: 6/2/2009
Expiration: 6/2/2014



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
BP Oil Company - Dayton Terminal

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Permit Number: P0092674
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Effective Date: 6/2/2009

Authorization

Facility ID: 0857040266
Application Number(s): A0024119, A0036759
Permit Number: P0092674
Permit Description: PTO renewal.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/2/2009
Effective Date: 6/2/2009
Expiration Date: 6/2/2014
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15
This document constitutes issuance to:

BP Oil Company - Dayton Terminal
621 BRANDT ST
DAYTON, OH 45404

of a Permit-to-Install and Operate 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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0092674
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Authorization (continued)

Permit Number: P0092674
 Permit Description: PTO renewal.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	J001
Company Equipment ID:	Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Air Stripper
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0092674

Facility ID: 0857040266

Effective Date: 6/2/2009

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



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Division of Air Pollution Control

Final Permit-to-Install and Operate

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., 5., 6., 7., and 8.
2. Facility-wide volatile organic compound (VOC) emissions shall not exceed 95 tons per rolling, 12-month period.
3. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, as rolling, 12-month summations.
4. The annual throughput of gasoline processed through the loading rack (emissions unit J001) shall not exceed 204,000,000 gallons per rolling, 12-month period. The annual throughput of distillates (diesel fuel, fuel oils and kerosene) processed through the loading rack (emissions unit J001) shall not exceed 250,000,000 gallons per rolling, 12-month period.
5. The permittee shall maintain monthly records of the following information for the loading rack (OEPA emissions unit ID J001):
 - a) the total throughput of gasoline, in gallons;
 - b) the total throughput of distillate, in gallons;
 - c) the rolling, 12-month gasoline throughput rate, in gallons; and
 - d) the rolling, 12-month distillate throughput rate, in gallons.
6. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) the rolling, 12-month gasoline throughput restriction of 204,000,000 gallons for emissions unit J001; and
 - (2) the rolling, 12-month distillates throughput restriction of 250,000,000 gallons for emissions unit J001.
 - b) the probable cause of each deviation (excursion);



- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- 7. The permittee shall submit annual reports that summarize the following information:
 - a) the total actual annual gasoline throughput rate for emissions unit J001, in gallons;
 - b) the total actual annual distillate throughput rate for emissions unit J001, in gallons;
 - c) the total actual annual VOC emissions for the entire facility, in tons;
 - d) the total actual annual individual HAP emissions for the entire facility, in tons; and
 - e) the total actual annual combined HAPs emissions for the entire facility, in tons.

These reports shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.

- 8. Compliance with the emission limitations in 2. and 3., above shall be determined in accordance with the following methods:

a) Emission Limitation:

Facility-wide VOC emissions shall not exceed 95 tons per rolling, 12-month period.

Facility-wide individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period.

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

Applicable Compliance Method:

Compliance with the annual VOC and HAP emissions limitations is based on compliance with the gasoline and distillate throughput limitations and compliance with the VOC emissions limitation for emissions unit J001 of 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel, as included in C.1.



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C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

Loading Rack with Carbon Adsorption Vapor Recovery Unit

- a) 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.
- 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)	<p>Volatile organic compound (VOC) emissions from the vapor recovery unit (VRU) shall not exceed 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel and 51.60 tons per year (TPY).</p> <p>VOC emissions from distillates (diesel fuels, fuel oils, and kerosene) loading shall not exceed 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel and 2.38 TPY.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(Q)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-72-03(A)	See b)(2)b.

(2) Additional Terms and Conditions

- a. The VOC emissions limitation of 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. During the low R.V.P. control period (time period beginning June 1 and ending September 15 of each year), no refiner, importer, distributor, reseller, carrier, retailer or wholesale purchaser-consumer shall sell, offer for sale, dispense, supply, offer for supply, or transport (for use in a low R.V.P. control area) gasoline that has a R.V.P. exceeding 7.8 P.S.I.

c) Operational Restrictions

- (1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- (2) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system; and
 - b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
- (3) The loading rack shall be provided with a means 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.
- (4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.
- (6) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and 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.

- (7) The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 3% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation (60 mg/l), but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.]
- (8) Each time that the physical custody or title of low R.V.P. gasoline changes hands (excluding when gasoline is sold or dispensed for use in motor vehicles at a retail outlet or wholesale purchaser-consumer facility), the transferor shall provide to the transferee, on or in addition to normal bills of lading, invoices, and the like, a document containing information regarding that shipment. This document shall accompany every shipment of gasoline after it has been dispensed or sold. The document shall contain, at a minimum, the following information:
 - a. The date of transfer.
 - b. The volume of the gasoline being transferred.
 - c. If the gasoline is ethanol blended, the percentage by volume of ethanol in the gasoline.
 - d. The location of the gasoline at the time of the transfer.
 - e. A statement certifying that the gasoline has an R.V.P. of 7.8 P.S.I. or less, except as provided in rule 3745-72-07 of the Administrative Code.
- (9) No person in the gasoline distribution network may sell, dispense or transfer low R.V.P. gasoline intended for use in a low R.V.P. control area without transfer documents that accurately contain the information listed in c)(8).
- (10) A terminal operator who sells or dispenses gasoline intended for use in a low R.V.P. control area during the low R.V.P. control period may not accept gasoline into the terminal or dispense gasoline unless all of the following requirements are met:
 - a. Transfer documentation that accompanies the low R.V.P. gasoline contains the information listed in c)(8).
 - b. The terminal owner or operator conducts a quality assurance program including, but not limited to, periodic product sampling and testing in accordance with 40 CFR 80.8 and OAC rule 3745-72-08.
 - c. Low R.V.P. gasoline is segregated from conventional gasoline.
 - d. Clearly marked documents accompany the conventional gasoline labeling it as "conventional gasoline, not for sale to the ultimate consumer in a low R.V.P. control area."
- (11) During the low R.V.P. control period, no refiner, importer, ethanol blender, carrier, distributor, reseller, or person may sell, offer for sale, dispense, supply or offer for supply gasoline for use in a low R.V.P. control area that is represented as low R.V.P. gasoline if



the gasoline does not meet the definition of low R.V.P. gasoline and is not accompanied by the statement required in c)(8)e.

- (12) Gasoline containing ethanol may exceed the R.V.P. limit specified b)(2)b by no more than one P.S.I. if the gasoline meets all of the following requirements:
 - a. The gasoline must contain denatured, anhydrous ethanol.
 - b. The concentration of the anhydrous ethanol, excluding the required denaturing agent, must be at least nine per cent and no more than ten per cent, by volume, of the gasoline.
 - c. The ethanol content of the gasoline shall be determined by use of one of the testing methodologies specified in 40 CFR 80.8. The maximum ethanol content of gasoline shall not exceed any applicable waiver conditions under section 211(f)(4) of the Clean Air Act.
 - (13) Each invoice, loading ticket, bill of lading, delivery ticket, and other document that accompanies a shipment of gasoline containing ethanol shall contain a statement that the gasoline being shipped contains ethanol and shall list the volume percentage of ethanol in that gasoline.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total throughput of gasoline, in gallons; and
 - b. the total throughput of distillate, in gallons.
 - (2) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the VRU using the 40 CFR Part 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last 5 minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the VRU.
 - (3) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
 - (4) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the lower explosive limit (LEL) as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.



- (5) Low R.V.P. control area terminal operators shall maintain records on low R.V.P. gasoline containing all of the following information:
 - a. The volume of each shipment or truckload of gasoline leaving the terminal.
 - b. If the fuel is blended with ethanol, the type and percentage by volume of ethanol used in each shipment or truckload of gasoline leaving the terminal.
 - c. The volume, name and address of the owner of every shipment of gasoline leaving the terminal and a statement indicating that the gasoline has an R.V.P. of 7.8 P.S.I. or less.
 - d. The destination of each tank truck sale or batch of gasoline.
 - e. The date of the sale or transfer of every shipment of gasoline leaving the terminal.
 - f. The results of any tests for R.V.P. of the gasoline sold or transferred and who performed the tests.
- (6) Each person in the gasoline distribution network shall maintain records containing compliance information as required in this rule. These records shall be retained by the regulated parties for at least two years from the date of creation or receipt of the records and shall be kept on site for a minimum of ninety days. For the remainder of the retention period, the records may be kept at a centralized location within the state of Ohio.

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the following information:
 - a. the total actual annual gasoline throughput rate for this emissions unit, in gallons;
 - b. the total actual annual distillate throughput rate for this emissions unit, in gallons; and
 - c. the total actual annual VOC emissions for this emissions unit, in tons;

These reports shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
- (2) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall



cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. The emission testing shall be conducted within 12 months prior to the expiration of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the emissions limitation of 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.
- c. The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test, during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum gasoline throughput possible.)
- d. Not later than 45 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- e. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- f. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from the vapor recovery unit (VRU) shall not exceed 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.



Applicable Compliance Method:

Compliance with the lb VOC/1000 gallons of gasoline loaded emission limitation above shall be based upon the results of emission tests conducted in accordance with the procedures outlined in f)(1) of this permit.

b. Emission Limitation:

VOC emissions from distillates loading shall not exceed 0.019 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel.

Applicable Compliance Method:

Compliance is based on the following calculation using Equation 1 from AP-42, Section 5.2 (revised 1/95):

$$\text{VOC emissions} = (12.46 * S * P * M) / T$$

$$\text{VOC emissions} = ((12.46 * 1.0 * 0.0065 \text{ psi} * 130 \text{ lb/lb-mol}) / 520 \text{ }^\circ\text{R}) = 0.019$$

Where:

S = saturation factor = 1.0 (AP-42, Table 5.2-1)

P = true vapor pressure of liquid = 0.0065 psia (AP-42, Table 7.1-2)

M = vapor molecular weight = 130 lb/lb-mol (AP-42, Table 7.1-2)

T = temperature of bulk liquid = 60 °F = 520 °R

c. Emission Limitation:

VOC emissions from the VRU shall not exceed 51.60 TPY.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation is based on compliance with the gasoline throughput limitation and compliance with the VOC emissions limitation of 0.50 pound of VOC per 1000 gallons (60 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

d. Emission Limitation:

VOC emissions from distillates loading shall not exceed 2.38 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation is based on compliance with the distillate throughput limitation.

g) Miscellaneous Requirements

- (1) This permit supercedes PTI 08-3147 issued February 8, 1985.



2. P002, Air Stripper

Operations, Property and/or Equipment Description:

Air Stripper

- a) 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.
- 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)	Organic compound (OC) emissions from this emissions unit shall not exceed 2.1 lbs/hr, 40 lbs/day, and 9.2 tons per year (TPY). See b)(2)(a).
b.	OAC rule 3745-21-07(G)(2)	The hourly organic compound emission limitation in this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05. The daily organic compound emission limitation in this rule is equivalent to the daily emission limitation established pursuant to OAC rule 3745-31-05. See b)(2)(a).



- (2) Additional Terms and Conditions
 - a. The OC emission limitations of 40 pounds per day shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current OAC rule 3745-21-07 as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, these emission limitations and the associated monitoring, record keeping, reporting, and testing requirements shall be void.
 - b. The hourly emissions limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- c) Operational Restrictions
 - (1) The total OC concentration, including benzene, toluene, ethylbenzene, and xylene (BTEX), in the influent groundwater stream to this emissions unit shall not exceed 8400 parts per billion (ppb).
 - (2) The daily throughput of groundwater through this emissions unit shall not exceed 720,000 gallons per day.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall take monthly samples of the influent groundwater stream and conduct, or have conducted, an analysis for BTEX compounds. The analysis shall be conducted in accordance with U.S. EPA modified RM 602.
 - (2) The permittee shall maintain daily records of the following information:
 - a. the daily throughput of groundwater through this emissions unit;
 - b. the results of the sampling/analyses required above; and
 - c. the calculation of the hourly and daily emission rates.
- e) Reporting Requirements
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (2) The permittee shall submit annual reports which specify the total OC emissions in tons from this emissions unit for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
- f) Testing Requirements
 - (1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):



a. Emission Limitation:

OC emissions from this emissions unit shall not exceed 2.1 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined using the following equation:

$$(X * Y * 3.785 \text{ l/gal}) / (1,000,000 \text{ } \mu\text{g/g} * 454 \text{ g/lb})$$

Where:

X = maximum volume-weighted average annual benzene, toluene, ethylbenzene and xylene (BTEX) concentration in ppb or $\mu\text{g/l}$, which is 8400 ppb.

Y = maximum hourly groundwater throughput in gal/hr, which is 30,000 gal/hr based on 720,000 gallons/day

$$(8400 * 30,000 * 3.785 \text{ l/gal}) / (1,000,000 \text{ } \mu\text{g/g} * 454 \text{ g/lb}) = 2.1 \text{ lbs/hr}$$

b. Emission Limitation:

OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined using the following equation:

$$(X * Y * 3.785 \text{ l/gal}) / (1,000,000 \text{ } \mu\text{g/g} * 454 \text{ g/lb})$$

Where:

X = volume-weighted average daily benzene, toluene, ethylbenzene and xylene (BTEX) concentration in ppb or $\mu\text{g/l}$

Y = daily groundwater throughput in gal/day

c. Emission Limitation:

OC emissions from this emissions unit shall not exceed 9.2 TPY.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined using the following equation:

$$(X * Y * 3.785 \text{ l/gal}) / (1,000,000 \text{ } \mu\text{g/g} * 454 \text{ g/lb})$$



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092674

Facility ID: 0857040266

Effective Date: 6/2/2009

Where:

X = volume-weighted average annual benzene, toluene, ethylbenzene and xylene (BTEX) concentration in ppb or $\mu\text{g/l}$

Y = annual groundwater throughput in gal/year.

g) Miscellaneous Requirements

- (1) This permit supercedes PTI 08-2029 issued March 20, 1991.