



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

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www.epa.state.oh.us

MAILING ADDRESS:

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

6/23/2009

Justin Lamb, II
DELTA FUELS, INC
1820 FRONT ST
Toledo, OH 43605

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010387
Permit Number: P0088129
Permit Type: Renewal
County: Lucas

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
DELTA FUELS, INC

Issue Date: 6/23/2009
Permit Number: P0088129
Permit Type: Renewal
Permit Description: FESOP renewal for J001
Facility ID: 0448010387
Facility Location: DELTA FUELS, INC
1820 FRONT ST,
TOLEDO, OH 43605
Facility Description: Petroleum Bulk Stations and Terminals

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This FESOP is for the operation of 1953 bulk fuel terminal. This source is currently operating under a FESOP issued 11/20/97. This permit will revise the previously issued permit by updating the terms and conditions to match recommended OEPA standard language, by adjusting the throughput limitations and by simplifying the PTE demonstration for the HAPs limitations to a one-time calculation as provided in 40 CFR Part 63, Subpart R.

PROCESS DESCRIPTION

Delta Fuels operates a bulk fuel terminal located at 1820 Front Street in Toledo, Lucas County, Ohio. J001 loads gasoline, ethanol and distillates into tanker trucks in two bays with three loading arms each. Vapor recovery is provided by an activated carbon control system. This permit will add the capability to load biodiesel to the terminal. Biodiesel emissions are much lower than that of the traditional distillates and the addition of biodiesel does not constitute a permit modification under State or Federal regulations. This location has five large storage tanks and eight small tanks, all installed prior to June 11, 1973 and therefore exempted from NSPS Subpart K applicability. With the exception of the ethanol and gasoline storage tanks, T003 thru T005, these tanks qualify for permit exemptions under the provisions of OAC rule 3745-15-05(B).

3. Facility Emissions and Attainment Status:

The facility is currently a minor source of all pollutants, and will remain a minor source under the conditions of this new permit. Toledo is designated attainment for all pollutants.

4. Source Emissions:

Total federally enforceable emissions limitations from this facility are 36.5 tons per year as VOC from all non-fugitive sources, and less than 10 tons per year as any individual HAP and 25 tons per year for all combined HAPs from all sources.

APPLICABLE REGULATIONS

OAC rule 3745-31-05(A)(3) not applicable

OAC rule 3745-31-05(D)(1) volunteered restrictions on load rack emissions and throughput

OAC rule 3745-21-09(R) internal floating roof requirement for the storage of gasoline

OAC 3745-21-09(Q) vapor recovery and control not to exceed 0.67 lb/1000 gal, operating procedures for gasoline tank truck loading

NSPS K, Ka, Kb exempt, installed prior to June 11, 1973



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Facility ID: 0448010387

NSPS XX exempt, no construction or modification commenced after December 17, 1980
 MACT R exempt, not a major source of HAPS per section 63.420
 MACT Y exempt, not an affected source as defined in section 63.561

PERMIT ALLOWABLE EMISSIONS

In the previous 1997 FESOP Delta Fuels volunteered to a restricted permit allowable of 0.43 pound per 1000 gallons for gasoline, 0.52 pound per 1000 gallons for ethanol and 0.015 pound per 1000 gallons for distillate. This is more restrictive than the RACM requirement of OAC 3745-21-09(Q) which is 0.67 lb/1000 gallon for gasoline.

In a previous FESOP prepared for this facility, a plant-wide limitation of 120,000,000 gallons per year was requested for gasoline, 40,000,000 gallons per year was requested for ethanol, and a limit of 40,000,000 gallons per year was requested for distillates. These restrictions equated to an allowable emission of 36.5 tons VOC per year. It has been determined that revised limitations for gasoline, ethanol and distillates/biodiesel should be established. This does not constitute a modification as the ethanol, which is less than 1.5 psig at 80°F, was previously being loaded, and biodiesel, which is not a significant source of VOC, will be treated as if it were distillate. The revised restrictions will be 120,000,000 gallons per year of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than ethanol, 40,000,000 gallons per year of ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2, and 40,000,000 gallons per year of distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2 to match the AP-42 calculations presented below. Interface mixtures will be included in the gasoline throughput limitation.

Total non-fugitive PTE for the Title V major source facility determination will equal the worst case non-fugitive losses from the loading operations:

$$[120,000,000 \text{ gal/yr (0.43 lb VOC/1000 gal gasoline)} + 40,000,000 \text{ gal/yr (0.52 lb/1000 gal ethanol)} + 40,000,000 \text{ gal /yr (0.015 lb/1000 gal distillate/biodiesel)}][1 \text{ ton/2000 lb}] = 36.5 \text{ tpy VOC PTE}$$

Note: This stationary source category is not subject to a standard promulgated under section 111 or 112 of the Act before August 7, 1980, therefore fugitive emissions of criteria pollutants will not be considered in any determination of major source status for Title V purposes. The only stack emissions at this facility are the stack emissions from J001 and J003.

The minor source facility HAP determination was made by the following:

Compliance with this emissions limitation was demonstrated by a one-time calculation following the procedure for the determination of MACT applicability given in 40 CFR Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations, Section 63.420 - Applicability), where compliance is determined by a calculated value of ET of less than 1.0, as follows:

$$ET = CF [0.59(T_F)(1-CE) + 0.17(T_E) + 0.08(T_{ES}) + 0.038(T_i) + 8.5 \times 10^{-6}(C) + KQ] + 0.04(OE)$$

$$ET = 0.161[0.59(0)(1-0) + 0.17(0) + 0.08(0) + 0.038(3) + 8.5 \times 10^{-6}(1000) + (4.52 \times 10^{-9})(52+13)(1.24 \times 10^6)] + 0.04(0.28)$$

$$ET = 0.161 [(0) + (0) + (0) + (0.114) + (0.009) + (0.364)] + (0.011)$$



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$$ET = 0.161 [0.487] + (0.011)$$

$$ET = 0.089$$

where:

ET = emissions screening factor for bulk gasoline terminals, this number will be less than 1.0 if the facility is a minor source for HAPs

CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater methyl tert-butyl ether (MTBE),

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels = 0;

T_F = total number of fixed-roof gasoline storage vessels without an internal floating roof = 0;

T_E = total number of external floating roof gasoline storage vessels with only primary seals = 0;

T_{ES} = total number of external floating roof gasoline storage vessels with primary and secondary seals = 0;

T_I = total number of fixed-roof gasoline storage vessels with an internal floating roof; There are three permitted IFR gasoline storage tanks = 3 (emissions units T003 thru T005);

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service = 1000 (897 was existing number in 1996 submittal);

Q = gasoline throughput limitation on potential to emit (liters/day) = 120,000,000 gal/yr (3.7854 l/gal)(1 yr/365 d) = 1.24x10⁶ l/d

K = (4.52x10⁻⁹)(EF + L) for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded) = 0.43 lb/1000 gal (1000 gal/3785.4 l)(454,000 mg/lb) = 52 mg/l;

OE = other HAP emissions screening factor for bulk gasoline terminals (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equation for ET = 0.28 tons per year based on an analysis submitted by the company on 6/4/2001.

L = 13 mg/l for gasoline cargo meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in 40 CFR 60.501.

5. Conclusion:

With enforceable restrictions on throughput and appropriate controls, this facility will remain a minor source for Title V and MACT purposes.



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6. Please provide additional notes or comments as necessary:

While this is a synthetic minor facility, the potential to emit is 36.5 tpy with restrictions and the facility is not subject to any OEPA standardized monitoring for activated carbon. The facility volunteered the following parametric monitoring established by stack testing:

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, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

The meter reading is confirmed by parametric monitoring.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	36.5 (no increase)



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DRAFT

**Air Pollution Permit-to-Install and Operate
for
DELTA FUELS, INC**

Facility ID: 0448010387
Permit Number: P0088129
Permit Type: Renewal
Issued: 6/23/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



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Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
DELTA FUELS, INC

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Draft Permit-to-Install and Operate

Permit Number: P0088129

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Authorization

Facility ID: 0448010387
Application Number(s): A0019270
Permit Number: P0088129
Permit Description: FESOP renewal for J001
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 6/23/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

DELTA FUELS, INC
1820 FRONT ST
TOLEDO, OH 43605

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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



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Facility ID: 0448010387

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0088129
Permit Description: FESOP renewal for J001

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



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



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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



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Effective Date: To be entered upon final issuance

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) None.



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C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

loading rack at a bulk gasoline terminal comprised of 6 loading arms in 2 bays handling gasoline, ethanol, distillates and biodiesel, individually or as mixtures, controlled by a vapor collection system with a regenerative carbon adsorber

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. b)(1)a., b)(2)a. through f., c)(1), c)(2), d)(1), d)(2), f)(1)a. through f)(1)d.

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(D)(1)	the emissions of volatile organic compounds (VOC) from the adsorber stack shall not exceed 36.5 tons per year see b)(2)a. thru f.
b.	OAC rule 3745-21-09(Q)	see b)(2)g.
c.	40 CFR Part 60 Subpart XX	exempt, see b)(2)h.
d.	40 CFR Part 63, Subpart R	exempt, not a major source of HAPS per 40 CFR Section 63.420

(2) Additional Terms and Conditions

a. The permittee shall restrict the loading of organic liquids in this emissions unit to those with a true vapor pressure equal to or less than that of RVP 15 gasoline.

b. For gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol: the stack emissions of VOC shall not exceed 0.43 pound per 1,000 gallons loaded into the delivery vessel.



- c. For ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2: the emissions of VOC shall not exceed 0.52 pound of VOC per 1,000 gallons loaded into the delivery vessel.
 - d. For distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2: the emissions of VOC shall not exceed 0.015 pound of VOC per 1,000 gallons loaded into the delivery vessel.
 - e. The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be less than 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling, 12-month summations. These annual emission limitations were established to reflect the potential to emit for this facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
 - f. This stationary source category is not subject to a standard promulgated under section 111 or 112 of the Act before August 7, 1980, therefore fugitive emissions of criteria pollutants will not be considered in any determination of major source status for Title V purposes.
 - g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B)(2).
 - h. No construction or modification (as defined in by 40 CFR 60.14) which commenced after December 17, 1980, has affected those loading racks which deliver liquid product into gasoline tank trucks (as defined by 40 CFR 60.501).
- c) Operational Restrictions
- (1) The annual throughputs of organic liquids in this emissions unit shall not exceed;
 - a. 120,000,000 gallons per year of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;
 - b. 40,000,000 gallons per year of ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and
 - c. 40,000,000 gallons per year of distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.
- Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.
- (2) 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, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.



- (3) 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.
 - (4) 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.
 - (5) 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.
 - (6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
 - (7) 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.
 - (8) 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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee loads organic liquids with a true vapor pressure greater than that of RVP 15 gasoline in this emissions unit, the permittee shall maintain a record of the type and quantity of organic liquid loaded.
 - (2) The permittee shall maintain monthly records for this emissions unit of the total throughput (loadout volumes) in gallons per month, and the rolling, 12-month summation of the throughput, in gallons per year;
 - a. for gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;
 - b. for ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and
 - c. for distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.



- (3) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.
 - (4) 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).
 - (5) The permittee shall maintain a daily log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.
 - (6) 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 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.
- e) Reporting Requirements
- (1) 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:
 - i. The annual throughputs of organic liquids in this emissions unit shall not exceed;
 - (a) 120,000,000 gallons per year of gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol;
 - (b) 40,000,000 gallons per year of ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2; and
 - (c) 40,000,000 gallons per year of distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2.
 - Compliance with the annual limitations shall be based upon the rolling, 12-month summation of the monthly recorded throughputs.
 - 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

a. Emission Limitation:

For gasoline, fuel additives and other organic liquids with a true vapor pressure greater than that of ethanol: the stack emissions of VOC shall not exceed 0.43 pound per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

Compliance shall be demonstrated by the results of the most recent stack test performed on this emissions unit (0.02 pound VOC per 1,000 gallons of gasoline based on testing performed May 22, 2000).

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed OAC rule 3745-21-10(E). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

For ethanol, fuel additives and other organic liquids with a true vapor pressure less than or equal to ethanol but greater than distillate fuel oil #2: the emissions of VOC shall not exceed 0.52 pound of VOC per 1,000 gallons loaded into the delivery vessel.



Applicable Compliance Method:

This emission limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$L = 12.46 \text{ SPM/T}$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (0.6 for submerged loading dedicated normal service - AP-42 Table 5.2-1)

P = true vapor pressure, psia (ethyl alcohol = 0.619 - AP-42 Table 7.1-2)

M = molecular weight, lb/lb mole (distillate = 46.07)

T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

c. Emission Limitation:

For distillates, biodiesel and other organic liquids with a true vapor pressure less than or equal to distillate fuel oil #2: the emissions of VOC shall not exceed 0.015 pound of VOC per 1,000 gallons loaded into the delivery vessel.

Applicable Compliance Method:

This emission limitation was developed based on a one-time worst case emissions calculation utilizing the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Equation (1) dated 1/95, as follows:

$L = 12.46 \text{ SPM/T}$

where:

L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (0.6 for submerged loading dedicated normal service - AP-42 Table 5.2-1)

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

M = molecular weight, lb/lb mole (distillate = 130)



T = temperature of bulk liquid, degrees R (520)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with U.S. EPA approved test methods used with prior written approval from the Ohio EPA.

d. Emission Limitation:

The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be less than 10 tons per year of any individual HAP, and 25 tons per year for any combination of HAPs, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated by a one-time calculation following the procedure for the determination of MACT applicability given in 40 CFR Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations, Section 63.420 - Applicability), where compliance is determined by a calculated value of ET of less than 1.0, as follows:

$$ET = CF [0.59(T_F)(1-CE) + 0.17(T_E) + 0.08(T_{ES}) + 0.038(T_I) + 8.5 \times 10^{-6}(C) + KQ] + 0.04(OE)$$

$$ET = 0.161[0.59(0)(1-0) + 0.17(0) + 0.08(0) + 0.038(3) + 8.5 \times 10^{-6}(1000) + (4.52 \times 10^{-9})(52+13)(1.24 \times 10^6)] + 0.04(0.28)$$

$$ET = 0.161 [(0) + (0) + (0) + (0.114) + (0.009) + (0.364)] + (0.011)$$

$$ET = 0.161 [0.487] + (0.011)$$

$$ET = 0.089$$

where:

ET = emissions screening factor for bulk gasoline terminals, this number will be less than 1.0 if the facility is a minor source for HAPs

CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater methyl tert-butyl ether (MTBE),

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels = 0;

T_F = total number of fixed-roof gasoline storage vessels without an internal floating roof = 0;

T_E = total number of external floating roof gasoline storage vessels with only primary seals = 0;



T_{ES} = total number of external floating roof gasoline storage vessels with primary and secondary seals = 0;

T_I = total number of fixed-roof gasoline storage vessels with an internal floating roof; There are three permitted IFR gasoline storage tanks = 3 (emissions units T003 thru T005);

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service = 1000 (897 was existing number in 1996 submittal);

Q = gasoline throughput limitation on potential to emit (liters/day) = 120,000,000 gal/yr (3.7854 l/gal)(1 yr/365 d) = 1.24×10^6 l/d

$K = (4.52 \times 10^{-9})(EF + L)$ for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded) = 0.43 lb/1000 gal (1000 gal/3785.4 l)(454,000 mg/lb) = 52 mg/l;

OE = other HAP emissions screening factor for bulk gasoline terminals (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equation for $ET = 0.28$ tons per year based on an analysis submitted by the company on 6/4/2001.

$L = 13$ mg/l for gasoline cargo meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in 40 CFR 60.501.

Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable in a written agreement to the Ohio EPA, the Toledo Division of Environmental Services and the permittee.

- (2) 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 of issuance of this permit and within 12 months prior to permit expiration, and shall be performed between April 30 and May 31.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate from VOC for gasoline loading.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 2A, 21 and 25B of 40 CFR Part 60, Appendix A and 3745-21-10(E).
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.



- e. At least once during the testing period, the permittee shall perform monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using the 40 CFR 60, Appendix A, Method 21 procedure for open ended lines. The maximum exhaust gas VOC concentration in % (as propane), measured during the processing of vapors during the last five minutes of the adsorption cycle for each vessel, shall be recorded.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services refusing to accept the results of the emission test(s).
 - g. Personnel from the Toledo Division of Environmental Services 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.
 - h. 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 Toledo Division of Environmental Services within 30 days following completion of the test(s).
- g) Miscellaneous Requirements
- (1) None.