



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01322

Fac ID: 0125040239

DATE: 11/1/2005

BP Columbus Terminal
Leanne Kunce
4800 East 49th St
Cleveland, OH 44125

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/1/2005
Effective Date: 11/1/2005**

FINAL PERMIT TO INSTALL 01-01322

Application Number: 01-01322
Facility ID: 0125040239
Permit Fee: **\$750**
Name of Facility: BP Columbus Terminal
Person to Contact: Leanne Kunce
Address: 4800 East 49th St
Cleveland, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:
**303 Wilson Ave
Columbus, Ohio**

Description of proposed emissions unit(s):
Storage tank.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	1.01 TPY

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T020 - 634,475 gallon gasoline storage tank with internal floating roof	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 1.01 tons per year.
Modified This PTI supersedes the previously issued PTI January 1, 1992.	OAC rule 3745-21-09(L)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	40 CFR Part 60 Subpart Kb	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60, Subpart Kb.
		See A. 2. below.

2. Additional Terms and Conditions

- 2.a This storage tank shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof.

- ii. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled.
- iii. When the roof is resting on leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- iv. The internal floating roof shall be equipped with a dual seal system which has a primary seal with secondary seal. The primary seal is a flexible wiper and the secondary seal is a rim-mounted flexible wiper. The two seals must be mounted one above the other so that each forms a continuous closure that completely covers the space between the wall and the storage vessel and the edge of the internal floating roof.
- v. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- vi. Each opening in the internal floating roof except for the leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- vii. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- viii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- ix. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sampling well shall have slit fabric cover that covers at least 90% of the opening.
- x. Each penetration of the internal floating roof that allows for the passage of

a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

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

2.b The permittee shall not place, store, or hold petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute in T020 unless such tank, is designed or equipped with an internal floating roof and the following conditions are met:

- i. The automatic bleeder vents are to be closed at all times except when the roof is floated off or landed on the leg supports, and the rim vents, if provide, are to be set to open when the roof is being floated off the leg supports or is at the manufacturer's recommended setting.
- ii. All openings, except stub drains, are to be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

B. Operational Restrictions

- 1. The vapor pressure of any material stored in this emissions unit shall not exceed 42.76 kPa (6.2 psia).

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The name and identification of each petroleum liquid stored in the tank.
 - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.
 - c. The throughput in gallons of each petroleum liquid stored.
- 2. The permittee shall maintain the following records for the life of the source:
 - a. The dimension of the storage vessel and an analysis showing the capacity of the

storage vessel.

3. For a two year period, the permittee shall keep a record of the inspection performed as required by 60.113b(a)(1). Each record shall identify the following information:
 - a. Tank on which the inspection was performed.
 - b. Date the tank was inspected.
 - c. Observed condition of each component of the control equipment (seals, internal floating roof and fittings).

D. Reporting Requirements

1. The permittee shall furnish the Director Central District Office with a report that describes the control equipment and certifies that the control equipment meets the specifications of 60.112b(a)(1) and 60.113b(a)(1). This report shall be an attachment to the notification required by 60.7(a)(3).
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the internal floating roof, primary and/or secondary seals and seal(s) specifications which document a violation of the applicable control equipment requirements. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.
3. The permittee shall notify the Director Central District Office within 30 days of any exceedance of the vapor pressure as outlined in this permit. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation
1.01 TPY VOC

Applicable Compliance Method

Compliance with the emission limitation shall be demonstrated by the use of USEPA "Tanks Program 4.0".

2. Compliance with the control measure requirements in section A.2. of these terms and conditions shall be demonstrated by a review of facility records during a facility compliance inspection and recordkeeping requirements outlined in C.

F. Miscellaneous Requirements

1. After installing the control equipment required to meet 60.112b(a)(1) (permanently affixed roof and internal floating roof) the permittee shall comply with the testing and procedure requirements of 60.113b(a)(1) - 60.113b(a)(5).