



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

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

11/19/2009

KEITH WHITE
GAS AMERICA SERVICES, INC.
2700 W MAIN ST
GREENFIELD, IN 46140

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483000234
Permit Number: P0104970
Permit Type: OAC Chapter 3745-31 Modification
County: Warren

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, The Western Star. 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.ohio.gov/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 Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
GAS AMERICA SERVICES, INC.

Issue Date: 11/19/2009
Permit Number: P0104970
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chpt. 31 FEPTIO to incorporate Federally Enforceable requirements for the use of a new enclosed flare for VOC emissions control from two ethanol loading racks, bottom loading partially filled gasoline tank trucks.
Facility ID: 1483000234
Facility Location: GAS AMERICA SERVICES, INC.
1226 STATE ROAD 122 WEST,
LEBANON, OH 45036
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 Alberta Mellon at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: The Gas America Services, Inc. facility is an organic chemical bulk plant that bottom loads ethanol and/or natural gasoline (a natural gas liquid) via two loading racks (emissions units J001 and J002) into partially filled tank trucks carrying a gasoline load thereby blending the components in the tank truck at the rack. The vapors displaced from the tank trucks loading in emissions units J001 and J002 are gasoline vapors which will be captured by an emission collection system and controlled with an enclosed combustor (flare).
3. Facility Emissions and Attainment Status: Emissions from the loading racks consist of volatile organic compounds (VOC) from fugitive gasoline vapors, and VOCs and visible particulate emissions (PE) along with other products of combustion (carbon monoxide, nitrogen oxides, and sulfur dioxide) from the enclosed flare stack. Warren County is considered non-attainment for NAAQS ozone and particulate matter 2.5 microns in diameter or less (PM_{2.5}) and attainment for the rest of the criteria pollutants.
4. Source Emissions: This chapter 31 modification was necessary because the permittee exceeded a previous permitted annual mass VOC emission limitation due to incorrect maximum daily throughput information submitted. The uncontrolled potential to emit (PTE) of VOC from emissions units J001 and J002 loading fuel ethanol and natural gasoline into the gasoline tank trucks is 430.46 tons per year (TPY) VOC. The uncontrolled PTE of hazardous air pollutants (HAP) from emissions units J001 and J002 is 5.26 TPY for the highest single HAP (hexane) and 14.24 TPY for the total HAP emissions. Thus, without restriction, the facility would be a major stationary source of VOC although a true minor source of HAP emissions.

The synthetic minor strategy for avoiding Title V permitting requirements for VOC consists of the use of an emission collection and control system including an enclosed flare for VOC destruction. This permit will require the collection system to maintain a minimum 99.2 percent (%) collection efficiency and the control system to maintain a minimum 98% destruction efficiency for VOC. While rolling, 12-month VOC emission limitations considering the VOC control system are included, no material throughput limitations are necessary in the synthetic minor strategy. The synthetic minor controlled PTE of VOC from emissions units J001 and J002 in this permit is 12.0 TPY.

5. Conclusion: Compliance with the cumulative and rolling, 12-month VOC emission limitations along with the other synthetic minor strategy requirements and compliance with the associated recordkeeping and reporting requirements will ensure the facility remains a synthetic minor, through OAC rule 3745-31-05(D), with respect to VOC emissions and will avoid major stationary source Title V and NSR requirements.
6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104970
Facility ID: 1483000234

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	12.0
NOx	0.52
CO	2.8



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
GAS AMERICA SERVICES, INC.**

Facility ID: 1483000234
Permit Number: P0104970
Permit Type: OAC Chapter 3745-31 Modification
Issued: 11/19/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
GAS AMERICA SERVICES, INC.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1483000234

Application Number(s): A0037657

Permit Number: P0104970

Permit Description: Chpt. 31 FEPTIO to incorporate Federally Enforceable requirements for the use of a new enclosed flare for VOC emissions control from two ethanol loading racks, bottom loading partially filled gasoline tank trucks.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$1,500.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 11/19/2009

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:

GAS AMERICA SERVICES, INC.
1226 STATE ROAD 122 WEST
LEBANON, OH 45036

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:

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

The above named entity is hereby granted 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

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104970

Permit Description: Chpt. 31 FEPTIO to incorporate Federally Enforceable requirements for the use of a new enclosed flare for VOC emissions control from two ethanol loading racks, bottom loading partially filled gasoline tank trucks.

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:	J002
Company Equipment ID:	Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: To be entered upon final issuance

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 Hamilton County Dept. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

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Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack

Operations, Property and/or Equipment Description:

5400 gallon per hour 2-bay, 2-loading arm, ethanol and natural gasoline (non-petroleum distillate) loading rack with enclosed flare for VOC control of displaced gasoline vapors; bottom loading partially filled gasoline tank trucks.

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. d)(7).

(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. See b)(2)e. and i.; d)(1) thru (4); e)(2); f)(1) and (2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-31-05(E)	Permit to Install and Operate P0104970 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): See b)(2)b. through b)(2)h.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Major New Source Review requirements	See b)(2)e. and i.; d)(1) thru (4); e)(2); f)(1) and (2).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO) and nitrogen oxides (NOx) emissions from this air contaminant source since the uncontrolled Potential to Emit (PTE) of each is less than 10 tons/yr.
- b. All materials loaded through this emissions unit shall be accomplished through the use of a bottom filling system.
- c. All ethanol and natural gasoline loading lines and unloading lines shall be equipped with fittings which are vapor tight.
- d. All leaks in liquid lines shall be repaired within fifteen days after identification.
- e. Emissions of volatile organic compounds (VOC) from the bottom loading of ethanol and/or natural gasoline to gasoline tank trucks shall be vented to an emission collection system with a minimum collection efficiency of 99.2% for the displaced gasoline vapors and an enclosed flare VOC emission control device with a minimum destruction efficiency of 98% for the captured gasoline vapors.
- f. All gasoline vapors collected by the emission collection system shall be vented to the enclosed flare.
- g. All vapors lines in the emission collection system shall be equipped with fittings that are vapor tight.
- h. Each gasoline tank truck loading at the rack shall have demonstrated that its product delivery tank will sustain a pressure change of not more than 1 inch of water within 5 minutes after it is pressurized to 17.7 inches of water. This capability is to be demonstrated using the pressure test procedure specified in Method 27. Documentation that the truck has met the specification shall be carried on the truck.
- i. The emissions of VOC from the enclosed flare emissions control device and fugitive emissions from truck loading shall not exceed 6.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	Maximum Allowable Cumulative Emissions of VOC <u>(Tons)</u>
1	0.5



1-2	1.0
1-3	1.5
1-4	2.0
1-5	2.5
1-6	3.0
1-7	3.5
1-8	4.0
1-9	4.5
1-10	5.0
1-11	5.5
1-12	6.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall record all periods of time during which there was no pilot flame or the flare was inoperable.
- (3) The permittee shall maintain a log of the downtime for the emission collection system and enclosed flare when the associated emissions units were in operation.
- (4) The permittee shall maintain monthly records of the following information:
 - a. the actual amount of ethanol and natural gasoline loaded into gasoline tank trucks, in gallons;
 - b. the VOC emission rate for each month of operations, which shall be a summation of:
 - i. for emissions from the enclosed flare VOC emission control device:



gallons loaded as recorded in a. x 9.10 lbs of VOC/1000 gallons loaded x 0.992 lb of VOC captured/lb of VOC emitted x [1 - (actual flare control efficiency, %/100)] = lbs of VOC per month from the enclosed flare; and

- ii. for fugitive emissions from truck loading:

gallons loaded as recorded in a. x 9.10 lbs of VOC/1000 gallons loaded x (1 - 0.992) lb of VOC fugitive/lb of VOC emitted = lbs of fugitive VOC per month from truck loading.

- c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

- (5) The permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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 quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission 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. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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).

f) Testing Requirements

- (1) Compliance with the applicable emission limitations and control measures in this FEPTIO shall be demonstrated by the following methods:



a. Emission Limitation:

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

Applicable Compliance Method:

The uncontrolled PTE of CO and NOx was established from information included in the application for FEPTIO P0104970 in the following calculations:

$215.23 \text{ TPY of VOC} \times 0.992 \text{ ton of VOC captured/ton of VOC emitted} = 213.51 \text{ TPY of VOC.}$

$213.51 \text{ ton of VOC/yr} \times 2000 \text{ lbs/ton} \times \text{gallon of gasoline/6.42 lbs of VOC} \times 114,000 \text{ Btu/gallon of gasoline} = 7.582598 \text{ E+9 Btu/yr or } 7,582.598 \text{ MMBtu/yr.}$

$7,582.598 \text{ MMBtu/yr} \times 0.37 \text{ lb of CO/MMBtu} \times 1 \text{ Ton/2000 lbs} = 1.40 \text{ TPY of CO.}$

$7,582.598 \text{ MMBtu/yr} \times 0.068 \text{ lb of NOx/MMBtu} \times 1 \text{ Ton/2000 lbs} = 0.26 \text{ TPY of NOx.}$

b. Emission Limitation:

Emissions of VOC from the bottom loading of ethanol and/or natural gasoline to gasoline tank trucks shall be vented to an emission collection system with a minimum collection efficiency of 99.2% for the displaced gasoline vapors and an enclosed flare VOC emission control device with a minimum destruction efficiency of 98% for the captured gasoline vapors.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for VOC, in the appropriate averaging period, and the capture efficiency and control efficiency limitations for VOC.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For VOC, Method 25 or Method 18, outlined in 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- iv. In AP-42, Fifth Edition, Volume I, Chapter 5.2 Transportation and Marketing of Petroleum Liquids, Changes to Section 5.2, June 17, 2008, a collection efficiency of 99.2%, for displaced vapors routed to a vapor control unit, is suggested for trucks meeting a 1 inch water column decay test. Method 27 outlined in 40 CFR Part 60, Appendix A, shall be used to determine the pressure decay of the product delivery tank.
- v. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- vi. 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 appropriate Ohio EPA District Office or local air agency.
- vii. Not later than 30 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).
- viii. 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.
- ix. 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.
- x. Immediately before the performance test the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.



c. Emission Limitation:

The emissions of VOC shall not exceed 6.0 tons per year, based on a rolling, 12-month summation of the VOC emissions, from the enclosed flare emission control device and fugitive emissions from truck loading.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC mass emission limitation shall be demonstrated by the records maintained in d)(4).

The allowable VOC mass emission limitation was established from information included in the application for FEPTIO P0104970 in the following calculations:

$5400 \text{ gal loaded/hr} \times 9.10 \text{ lbs of VOC/1000 gal loaded} \times 0.992 \text{ lb of VOC captured/lb of VOC emitted} \times (1-0.98) \text{ flare CE} \times 8760 \text{ hr/yr} \times 1 \text{ Ton/2000 lbs} = 4.27 \text{ TPY of VOC.}$

$5400 \text{ gal loaded/hr} \times 9.10 \text{ lbs of VOC/1000 gal loaded} \times (1-0.992) \text{ lb of fugitive VOC/lb of VOC emitted} \times 8760 \text{ hr/yr} \times 1 \text{ Ton/2000 lbs} = 1.72 \text{ TPY of VOC.}$

d. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



2. J002, Loading Rack

Operations, Property and/or Equipment Description:

5400 gallon per hour 2-bay, 2-loading arm, ethanol loading rack with enclosed flare for VOC control of displaced gasoline vapors; bottom loading partially filled gasoline tank trucks

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. d)(7).

(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. See b)(2)e. and i.; d)(1) thru (4); e)(2); f)(1) and (2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-31-05(E)	Permit to Install and Operate P0104970 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): See b)(2)b. through b)(2)h.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Major New Source Review requirements	See b)(2)e. and i.; d)(1) thru (4); e)(1) and (2); f)(1) and (2).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule.

(2) Additional Terms and Conditions

- a. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO) and nitrogen oxides (NOx) emissions from this air contaminant source since the uncontrolled Potential to Emit (PTE) of each is less than 10 tons/yr.
- b. All materials loaded through this emissions unit shall be accomplished through the use of a bottom filling system.
- c. All ethanol loading lines and unloading lines shall be equipped with fittings which are vapor tight.
- d. All leaks in liquid lines shall be repaired within fifteen days after identification.
- e. Emissions of VOC from the bottom loading of ethanol to gasoline tank trucks shall be vented to an emission collection system with a minimum collection efficiency of 99.2% for the displaced gasoline vapors and an enclosed flare VOC emission control device with a minimum destruction efficiency of 98% for the captured gasoline vapors.
- f. All gasoline vapors collected by the emission collection system shall be vented to the enclosed flare.
- g. All vapors lines in the emission collection system shall be equipped with fittings that are vapor tight.
- h. Each gasoline tank truck loading at the rack shall have demonstrated that its product delivery tank will sustain a pressure change of not more than 1 inch of water within 5 minutes after it is pressurized to 17.7 inches of water. This capability is to be demonstrated using the pressure test procedure specified in Method 27. Documentation that the truck has met the specification shall be carried on the truck.
- i. The emissions of VOC from the enclosed flare emission control device and fugitive emissions from truck loading shall not exceed 6.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	Maximum Allowable Cumulative Emissions of VOC <u>(Tons)</u>
1	0.5



1-2	1.0
1-3	1.5
1-4	2.0
1-5	2.5
1-6	3.0
1-7	3.5
1-8	4.0
1-9	4.5
1-10	5.0
1-11	5.5
1-12	6.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall record all periods of time during which there was no pilot flame or the flare was inoperable.
- (3) The permittee shall maintain a log of the downtime for the emission collection system and enclosed flare when the associated emissions units were in operation.
- (4) The permittee shall maintain monthly records of the following information:
 - a. the actual amount of ethanol loaded into gasoline tank trucks, in gallons;
 - b. the VOC emission rate for each month of operations, which shall be a summation of:
 - i. for emissions from the enclosed flare VOC emission control device:



gallons loaded as recorded in a. x 9.10 lbs of VOC/1000 gallons loaded x 0.992 lb of VOC captured/lb of VOC emitted x [1 - (actual flare control efficiency, %/100)] = lbs of VOC per month from the enclosed flare; and

- ii. for fugitive emissions from truck loading:

gallons loaded as recorded in a. x 9.10 lbs of VOC/1000 gallons loaded x (1 - 0.992) lb of VOC fugitive/lb of VOC emitted = lbs fugitive of VOC per month from truck loading.

- c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

- (5) The permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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 quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission 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. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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).

f) Testing Requirements

- (1) Compliance with the applicable emissions limitations and control measures in this FEPTIO shall be demonstrated by the following methods:



a. Emission Limitation:

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

Applicable Compliance Method:

The uncontrolled PTE of CO and NOx was established from information included in the application for FEPTIO P0104970 in the following calculations:

$215.23 \text{ TPY of VOC} \times 0.992 \text{ ton of VOC captured/ton of VOC emitted} = 213.51 \text{ TPY VOC.}$

$213.51 \text{ ton of VOC/yr} \times 2000 \text{ lbs/ton} \times \text{gallons of gasoline/6.42 lbs of VOC} \times 114,000 \text{ Btu/gallons of gasoline} = 7.582598 \text{ E+9 Btu/yr or } 7,582.598 \text{ MMBtu/yr.}$

$7,582.598 \text{ MMBtu/yr} \times 0.37 \text{ lb of CO/MMBtu} \times 1 \text{ Ton/2000 lbs} = 1.40 \text{ TPY of CO.}$

$7,582.598 \text{ MMBtu/yr} \times 0.068 \text{ lb of NOx/MMBtu} \times 1 \text{ Ton/2000 lbs} = 0.26 \text{ TPY of NOx.}$

b. Emissions Limitation:

Emissions of VOC from the bottom loading of ethanol to gasoline tank trucks shall be vented to an emission collection system with a minimum collection efficiency of 99.2% for the displaced gasoline vapors and an enclosed flare VOC emission control device with a minimum destruction efficiency of 98% for the captured gasoline vapors.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for VOC, in the appropriate averaging period, and the capture efficiency and control efficiency limitations for VOC.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For VOC, Method 25 or Method 18, outlined in 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- iv. In AP-42, Fifth Edition, Volume I, Chapter 5.2 Transportation and Marketing of Petroleum Liquids, Changes to Section 5.2, June 17, 2008, a collection efficiency of 99.2%, for displaced vapors routed to a vapor control unit, is suggested for trucks meeting a 1 inch water column decay test. Method 27 outlined in 40 CFR Part 60, Appendix A, shall be used to determine the pressure decay of the product delivery tank.
- v. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- vi. 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 appropriate Ohio EPA District Office or local air agency.
- vii. Not later than 30 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).
- viii. 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.
- ix. 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.
- x. Immediately before the performance test the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.



c. Emissions Limitation:

The emissions of VOC shall not exceed 6.0 tons per year, based on a rolling, 12-month summation of the VOC emissions, from the enclosed flare emission control device and fugitive emissions from truck loading.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC mass emission limitation shall be demonstrated by the records maintained in d)(4).

The allowable VOC mass emission limitation was established from information included in the application for FEPTIO P0104970 in the following calculations:

$5400 \text{ gal loaded/hr} \times 9.10 \text{ lbs of VOC/1000 gal loaded} \times 0.992 \text{ lb of VOC captured/lb of VOC emitted} \times (1-0.98) \text{ flare control efficiency} \times 8760 \text{ hr/yr} \times 1 \text{ Ton/2000 lbs} = 4.27 \text{ TPY of VOC.}$

$5400 \text{ gal loaded/hr} \times 9.10 \text{ lbs of VOC/1000 gal loaded} \times (1-0.992) \text{ lb of fugitive VOC/lb of VOC emitted} \times 8760 \text{ hr/yr} \times 1 \text{ Ton/2000 lbs} = 1.72 \text{ TPY of VOC.}$

d. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.