



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

1/11/2010

Certified Mail

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

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

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.ohio.gov/dapc.

Sincerely,

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

Cc: HCDOES

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



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

FINAL

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

Facility ID: 1483000234
Permit Number: P0104970
Permit Type: OAC Chapter 3745-31 Modification
Issued: 1/11/2010
Effective: 1/11/2010
Expiration: 1/11/2015



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

Final Permit-to-Install and Operate
Permit Number: P0104970
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Effective Date: 1/11/2010

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
Issue Date: 1/11/2010
Effective Date: 1/11/2010
Expiration Date: 1/11/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

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

Final Permit-to-Install and Operate
Permit Number: P0104970
Facility ID: 1483000234
Effective Date: 1/11/2010

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

Final Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: 1/11/2010

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104970

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104970

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Effective Date: 1/11/2010

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: 1/11/2010

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

Final Permit-to-Install and Operate

Permit Number: P0104970

Facility ID: 1483000234

Effective Date: 1/11/2010

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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20 percent opacity as a six-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>	<u>Maximum Allowable Cumulative Emissions of VOC (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:
$$\text{gallons loaded as recorded in a.} \times 9.10 \text{ lbs of VOC/1000 gallons loaded} \times 0.992 \text{ lb of VOC captured/lb of VOC emitted} \times [1 - (\text{actual flare control efficiency, \%}/100)] = \text{lbs of VOC per month from the enclosed flare; and}$$
 - ii. for fugitive emissions from truck loading:
$$\text{gallons loaded as recorded in a.} \times 9.10 \text{ lbs of VOC/1000 gallons loaded} \times (1 - 0.992) \text{ lb of VOC fugitive/lb of VOC emitted} = \text{lbs of fugitive VOC per month from truck loading.}$$
- 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:

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

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

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

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

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-



	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 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>	<u>Maximum Allowable Cumulative Emissions of VOC (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.