



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

7/21/2010

Certified Mail

Mr. Michael Churchill  
Enterprise Refined Products Company LLC  
P.O. Box 4324  
Houston, TX 77210-4324

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1483060110  
Permit Number: P0105998  
Permit Type: OAC Chapter 3745-31 Modification  
County: Warren

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT
Yes	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 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. 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 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 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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The emissions unit is a petroleum products (gasoline, diesel fuel, transmix) loading rack (emissions unit J001) at a gasoline terminal. The petroleum products are loaded into delivery vessels (tank trucks). The rack operates with a Vapor Collection System and Vapor Recovery Unit. This permit is a Chapter 31 Modification to add a 5<sup>th</sup> bay to the loading rack.

3. Facility Emissions and Attainment Status:

Emissions from the rack are volatile organic compounds (VOC)s and hazardous air pollutants (HAP)s associated with the loading of the petroleum products from the rack. The terminal is located in Warren County which is designated as attainment for ozone.

4. Source Emissions:

Absent the best available technology (BAT) annual gasoline loading limit (518,690,000 gallons) from air permit to install (PTI) 14-01089 (DAPC 12/10/09 guidance) for an emissions unit undergoing a Ohio Administrative Code (OAC) Chapter 31 modification, the potential to emit (PTE) for VOC from emissions unit J001 would be 440.19 tons per year (TPY) based on the MACT/NSPS/SIP allowable of 80 milligrams VOC/liter (0.67 lb/1000 gallons) loading loss allowable. HAP emissions from the same scenario are not greater than 10 TPY and 25 TPY, thus the facility remains a True Minor (Area) source of HAPs emissions.

To avoid being subject to major stationary source review (PSD) for VOC, this permit incorporates the previous loading limit (518,690,000 gallons) as a synthetic minor operational restriction and limits the VOC emissions to the previous annual allowable of 173.76 TPY. Both VOC and HAP limitations are based on rolling, 12-month limitations with the applicable rule being OAC rule 3745-31-05(D).

5. Conclusion:

The OAC rule 3745-31-05(D) requirements will allow the permittee to avoid PSD requirements for this Chapter 31 permit action for emissions unit J001. Appropriate monitoring record keeping and reporting requirements (MRR) to demonstrate compliance with the rolling, 12-month limitations is included in this permit.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	173.76

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Enterprise Refined Products Company LLC

Issue Date: 7/21/2010  
Permit Number: P0105998  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Chapter 31 Modification for the installation of a 5th bay on petroleum products loading rack J001 for loading of gasoline, diesel, and transmix to tank trucks.  
Facility ID: 1483060110  
Facility Location: Enterprise Refined Products Company LLC  
ERPCO Lebanon Terminal, 2700 Hart Road  
Lebanon, OH 45036  
Facility Description: All Other Support Activities for Transportation

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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Enterprise Refined Products Company LLC

Facility ID: 1483060110  
Permit Number: P0105998  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 7/21/2010  
Effective: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install
for
Enterprise Refined Products Company LLC

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## Authorization

Facility ID: 1483060110  
Facility Description: Gasoline, diesel, and jet fuel transportation, storage, and loading facility.  
Application Number(s): A0038826  
Permit Number: P0105998  
Permit Description: Chapter 31 Modification for the installation of a 5th bay on petroleum products loading rack J001 for loading of gasoline, diesel, and transmix to tank trucks.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 7/21/2010  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Enterprise Refined Products Company LLC  
ERPCO Lebanon Terminal  
2700 Hart Road  
Lebanon, OH 45036

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## **Authorization (continued)**

Permit Number: P0105998  
Permit Description: Chapter 31 Modification for the installation of a 5th bay on petroleum products loading rack J001 for loading of gasoline, diesel, and transmix to tank trucks.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	North Truck Loading Rack
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Hamilton County Dept. of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Hamilton County Dept. of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Hamilton County Dept. of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

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

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.  
  
No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.
- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

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

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

## **C. Emissions Unit Terms and Conditions**



1. J001, North Truck Loading Rack

Operations, Property and/or Equipment Description:

5 bay petroleum products tank truck loading rack with Vapor Recovery and Vapor Control System.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)  To avoid PSD for VOC emissions	Emissions of volatile organic compounds (VOC) shall not exceed 173.76 tons per year (TPY), based on a rolling, 12-month summation.  See b)(2)b.
b.	OAC rule 3745-21-09(Q)	See c)(1) through c)(6)
c.	ORC 3704.03(T) Case-by-Case BAT limit for mass VOC emissions when loading any petroleum product other than gasoline.	See b)(2)a.
d.	ORC 3704.03(T) Case-by-Case BAT for MACT mass VOC emissions when loading gasoline.	When loading gasoline, the requirements of this rule are equivalent to the requirements in 40 CFR Part 63, Subpart BBBBBB
e.	40 CFR Part 60, Subpart XX (§60.500 - §60.506)  [In accordance with 40 CFR 60.500 and 60.501, this emissions unit is a loading rack at a bulk gasoline terminal which delivers liquid product into gasoline tank trucks modified after December 17, 1980, operating with an existing vapor processing system which was not constructed or refurbished after that date.]	The mass emission limitation for VOC established pursuant to this rule is equivalent to the mass emission limitation established pursuant to OAC rule 3745-21-09(Q).  See c)(2)b.



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows f and g describe CFR Part 63 requirements and emission limitations for VOC.

(2) Additional Terms and Conditions

- a. The mass emissions of VOC from the vapor control system shall not exceed 0.67 pound of VOC per 1000 gallons...
b. The maximum transfer of all petroleum products to delivery vessels from this emissions unit shall not exceed 518,690,000 gallons per year...

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Petroleum Products Throughput. Lists throughput values for months 1 through 12.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual petroleum products throughput limitation shall be based upon a rolling, 12-month summation of the petroleum products throughput figures.

- c. The loading rack shall be equipped with a vapor collection and control system whereby during the transfer of petroleum products other than gasoline to any delivery vessel:
  - i. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system;
  - ii. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure;
  - iii. All petroleum product loading lines and vapor lines shall be equipped with fittings which are vapor tight; and
  - iv. All vapors collected by the vapor collection system are vented to the vapor control system.
  
- c) Operational Restrictions
  - (1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
    - a. All vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
    - b. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
  
  - (2) The loading rack shall be equipped with a vapor control system whereby:
    - a. All vapors collected by the vapor collection system are vented to the vapor control system;
    - b. The mass emissions of VOC from the vapor control system do not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel; and
    - c. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
  
  - (3) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is connected.
  
  - (4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
  
  - (5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

- (6) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure in the vapor collection system once per day while the emissions unit is in operation.
- (2) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC rule 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (3) The permittee shall properly install, operate, and maintain a continuous emissions monitoring system (CEMS) to determine the emissions of VOC from the loading rack recorded in milligrams of VOC per liter of all petroleum products loaded (or equivalent units). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information when the loading rack is in use:
- a. The inlet flow rate to the carbon adsorber in actual cubic feet per minute (ACFM);
  - b. The inlet hydrocarbon concentration (percent as propane);
  - c. The outlet hydrocarbon concentration (percent as propane);
  - d. The inlet vapor temperature;
  - e. The hourly average VOC emissions rate recorded in milligrams of VOC per liter of all petroleum products loaded;
  - f. The rolling, six-hour average VOC emissions rate recorded in milligrams of VOC per liter of all petroleum products loaded; and
  - g. A log of operating time for the capture (collection) system, carbon adsorber, monitoring equipment, and the associated emissions unit. The permittee may use the above CEMS information to document that the monitoring equipment and control device are operating when the emissions unit is in operation. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

Should an upgrade of the CEMS occur, the permittee shall notify the Hamilton County Department of Environmental Services at least 30 days prior to the modification taking place.

- (4) The permittee shall maintain monthly records of the following information:
  - a. The petroleum products throughput for each month;
  - b. 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 petroleum products throughput figures;
  - c. 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 petroleum products throughput for each calendar month; and
  - d. 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 [d)(4)b., converted to liters from gallons, multiplied by the actual VOC emissions rate as recorded by the CEM in d)(3)(f), in milligrams VOC per liter loaded, and converted to tons from milligrams equaling TPY VOC].
- (5) The permittee shall perform the following calibration checks to ensure the CEMS is not exceeding greater than 2.5 percent of the span value:
  - a. Automated calibration check on a daily basis; and
  - b. A monthly manual calibration check. The permittee shall collect and record the results of both the daily and monthly calibration checks. Should the span value exceed 2.5 percent, the permittee shall recalibrate the CEMS to correct the problem.
- (6) On a quarterly basis, the permittee shall conduct leak checks for the gasoline vapor collection system, vapor balance system, and carbon adsorption unit. The following methods and procedures shall be followed for detecting leaks of gasoline vapors by means of a portable hydrocarbon gas analyzer, which is calibrated to read in percent of the lower explosive limit as propane.
  - a. At a minimum, equipment capable of meeting the following standards shall be used:
    - i. A liquid manometer, or equivalent device, capable of measuring up to twenty-five inches of water gauge pressure with a precision of plus or minus 0.1 inch of water; and
    - ii. A portable hydrocarbon analyzer which:
      - (a) Is equipped with a sampling line of sufficient length for easy maneuverability during testing and a sampling probe having an internal diameter of 0.25 inch;

- (b) Is certified as safe for operation in explosive atmospheres;
- (c) Has a minimum range of zero to one hundred percent of the lower explosive limit as propane; and
- (d) Has a response time for full-scale deflection of less than eight seconds with sampling line and probe attached.

The portable hydrocarbon analyzer shall be calibrated with 2.2 percent propane by volume in air (or equivalent calibration gas) for one hundred percent of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

- b. At a minimum, the following test procedures for detecting leaks shall be followed:
  - i. Connect the liquid manometer to a pressure tap in the vapor control system, vapor collection system, or vapor balance system as close as possible to the connection with the gasoline tank truck;
  - ii. Record the pressure periodically during loading of the gasoline tank truck;
  - iii. Check with the portable hydrocarbon gas analyzer all potential leak sources; gasoline tank truck during loading and on the vapor control system, vapor collection system, or vapor balance system by:
    - (a) Maintaining the probe's inlet about one inch from the potential leak source in the path of (parallel to) the vapor flow from a leak;
    - (b) Moving the probe slowly around the periphery of the potential leak source to locate the point of highest meter response;
    - (c) Blocking as much as possible the wind from the area being monitored; and
    - (d) The location of leakage and the highest detector reading for each incidence of leakage shall be recorded in a log book. Should the leakage rate exceed that listed in c)(6), the permittee shall maintain records sufficient to demonstrate the leak was corrected within the time frames specified in c)(6).

(7) See 40 CFR Part 60, Subpart XX (§60.500 - §60.506).

(8) See 40 CFR Part 63, Subpart BBBB (§63.11080 - §63.11100).

e) Reporting Requirements

- (1) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any exceedance of the emissions limitation specified in b)(2)a.
    - i. The time and date the exceedance began;
    - ii. The length of the exceedance;
    - iii. The cause of the exceedance; and
    - iv. The corrective action taken to eliminate the exceedance.
  - b. all exceedances of the rolling, 12-month limitation on petroleum products throughput; 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 petroleum products throughput levels; and
  - c. all exceedances of the rolling, 12-month emission limitation for VOCs.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) See 40 CFR Part 60, Subpart XX (§60.500 - §60.506).
- (4) See 40 CFR Part 63, Subpart BBBB ( §63.11080 - §63.11100).

f) Testing Requirements

- (1) Compliance with the emission limitations shall be demonstrated in accordance with the following methods:

a. Emission Limitations:

The mass emissions of VOC from the vapor control system shall not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.

The mass emissions of VOC from the vapor control system shall not exceed 0.67 pound of VOC per 1000 gallons (80 milligrams of VOC per liter) of any other petroleum products loaded into the delivery vessel.

Applicable Compliance Method:

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

- i. The permittee demonstrated compliance for this emissions unit on September 29, 2009. Recurring tests shall occur according to the schedule outlined in the Title V Permit P0100574, Effective Date 5/8/2009 and consistent with Ohio EPA Engineering Guide #16. P0100574

requires that emissions testing be conducted within 12 months prior to the expiration of the Title V permit (5/8/2014);

- ii. The emissions testing shall be conducted to demonstrate compliance with the 0.67 pounds of VOC per thousand gallons (80 milligrams of VOC per liter) of gasoline loaded and the 0.67 pounds of VOC per thousand gallons (80 milligrams of VOC per liter) of other petroleum products loaded emissions limitations;
- iii. The tests shall be conducted as specified in OAC rule 3745-21-10(E), Method for the determination of VOC emissions from bulk gasoline terminals;
- iv. The tests 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;
- v. 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);
- vi. 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; and
- vii. 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.

\*For this emissions unit, the maximum capacity of the unit shall be defined as the 6-hour period in which the highest throughput normally occurs.

Ongoing compliance with the VOC emission limitations shall be determined by the information collected and recorded in d)(4).

The VOC emissions limitation per volume of gasoline loaded is the SIP-based allowable. The VOC emissions limitation per volume of other petroleum products

loaded is developed from the SIP allowable. The worst case loading scenario for other petroleum products assumes that a delivery vessels' load immediately prior was gasoline. Thus, during other petroleum products loading, the delivery vessel would be laden with gasoline vapors.

b. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 173.76 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirement in d)(4)d.

The annual VOC emission limitation was established based on information submitted in PTI Application A0038826, February 2010, for PTI P0105998:

$518,690,000 \text{ gallons of petroleum products/yr} \times 0.67 \text{ lb of VOC/1000 gallons of petroleum products (80 milligrams/liter)} \times 1 \text{ Ton/2000 lbs} = 173.76 \text{ TPY of VOC.}$

g) Miscellaneous Requirements

(1) None.