Ohio Environmental Protection Agency

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

Certified Mail

8/13/2010

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dayu Zhang
MID-VALLEY PIPELINE CO-CYGNET
P.O.Box 1014
Toledo, OH 43697

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0387000338
Permit Number: P0087893
Permit Type: Renewal
County: Wood

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.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
MID-VALLEY PIPELINE CO-CYGNET

Facility ID:	0387000338
Permit Number:	P0087893
Permit Type:	Renewal
Issued:	8/13/2010
Effective:	8/13/2010
Expiration:	8/13/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
MID-VALLEY PIPELINE CO-CYGNET

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Authorization

Facility ID: 0387000338
Application Number(s): A0018976
Permit Number: P0087893
Permit Description: Renewal PTIO for crude oil storage tanks, T001-T013
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/13/2010
Effective Date: 8/13/2010
Expiration Date: 8/13/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MID-VALLEY PIPELINE CO-CYGNET
5152 ROCK RIDGE RD
CYGNET, OH 43413

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

Authorization (continued)

Permit Number: P0087893
Permit Description: Renewal PTIO for crude oil storage tanks, T001-T013

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

Group Name: **Crude Oil Storage Tanks**

Emissions Unit ID:	**T001**
Company Equipment ID:	Tank 17 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T002**
Company Equipment ID:	Tank 18 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	Tank 19 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T004**
Company Equipment ID:	Tank 60 (1,470,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T005**
Company Equipment ID:	Tank 61 (1,470,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Tank 65 (1,470,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T007**
Company Equipment ID:	Tank 74 (1,470,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T008**
Company Equipment ID:	Tank 75 (1,470,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T009**
Company Equipment ID:	Tank 87 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T010**
Company Equipment ID:	Tank 88 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T011**
Company Equipment ID:	Tank 89 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T012**

Company Equipment ID:	Tank 99 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T013**
Company Equipment ID:	Tank 100 (3,360,000 gal)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Ohio EPA DAPC, Northwest District Office 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[1] 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 emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Crude Oil Storage Tanks: T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013,

EU ID	Operations, Property and/or Equipment Description
T001	3,360,000 gallon crude oil storage tank
T002	3,360,000 gallon crude oil storage tank
T003	3,360,000 gallon crude oil storage tank
T004	1,470,000 gallon crude oil storage tank
T005	1,470,000 gallon crude oil storage tank
T006	1,470,000 gallon crude oil storage tank
T007	1,470,000 gallon crude oil storage tank
T008	1,470,000 gallon crude oil storage tank
T009	3,360,000 gallon crude oil storage tank
T010	3,360,000 gallon crude oil storage tank
T011	3,360,000 gallon crude oil storage tank
T012	3,360,000 gallon crude oil storage tank
T013	3,360,000 gallon crude oil storage tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-21-09(Z)	See b)(2)a. through b)(2)g., d)(1) through d)(4) and e)(1)

(2) Additional Terms and Conditions

a. Any welded external floating roof storage tank equipped with a liquid-mounted primary seal and rim-mounted secondary seal, a mechanical shoe primary seal and a rim-mounted secondary seal, a mechanical shoe primary seal and a shoe-mounted, secondary seal, and the shoe-mounted secondary seal was installed prior to 1/10/81, a vapor-mounted primary seal and a rim-mounted secondary seal, and the vapor-mounted primary seal was installed prior to 1/01/81, or a flexible wiper primary seal and a rim-mounted secondary seal, and the flexible wiper primary seal was installed prior to 1/01/81 shall meet the following requirements:

i. There shall be no visible holes, tears, or other openings in the seal or seal fabric.

ii. For the primary seal, the total seal gap area shall not exceed 10.0 square inches per foot of tank diameter.

iii. For the secondary seal, the total seal gap area shall not exceed 1.0 square inch per foot of tank diameter.

The permittee may change the seal types during the term of this permit provided that a written notification and revised "emission activity category" form, including the results of the latest seal gap measurements, are submitted to the Ohio EPA, Northwest District Office within 30 days after the change occurs.

b. Any opening in the external floating roof, except automatic bleeder vents, rim space vents, leg sleeves, stub drains and slotted gauging/sampling wells, shall be equipped with:

i. A cover, seal or lid which remains in the closed position at all times without any visible gaps, except when the opening is in actual use.

ii. A projection into the tank below the liquid surface.

c. Any automatic bleeder vent shall remain in the closed position, except when the external floating roof is floated off or landed on the roof leg supports.

d. Any rim vent shall be set to open at the manufacturer's recommended setting, except when the external floating roof is being floated off the roof leg supports.

e. Any emergency roof drain shall be equipped with a slotted membrane fabric cover or other device which covers at least 90 percent of the area of the opening.

f. Any stub drain shall be equipped with a projection into the tank below the liquid surface.

g. Any slotted gauging/sampling well shall be equipped with an object which floats on the liquid surface within the well and which covers at least 90 percent of the area of the well opening.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The seal and seal fabric shall be inspected annually for visible holes, tears, or other openings.

(2) The secondary seal gap shall be measured annually in accordance with the methods specified in 40 CFR, Part 63, Subpart G, which are equivalent to, or more stringent than OAC rule 3745-21-10.

(3) The primary seal gap shall be measured at least once every 5 years, in accordance with the methods specified in 40 CFR, Part 63, Subpart G, which are equivalent to, or more stringent than OAC rule 3745-21-10.

(4) The permittee shall maintain records of the following information:

a. the dates and results of any seal and seal fabric inspections and any seal gap measurements;

b. the types of petroleum liquids stored in the tank;

c. the annual throughput of any petroleum liquid stored in the tank; and

d. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA, Northwest District Office) within 30 days of any seal and seal fabric inspection or any seal gap measurement which documents a violation of the applicable control equipment requirements. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.