



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/10/2011

Victor Canter
Valero Renewable Fuels Company, LLC
3979 State Route 238 NE
Bloomington, OH 43106

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0124000132
Permit Number: P0107511
Permit Type: OAC Chapter 3745-31 Modification
County: Fayette

Certified Mail

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

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 Josh Mandel," 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, Central District Office at (614)728-3778 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Valero Renewable Fuels Company, LLC**

Facility ID: 0124000132
Permit Number: P0107511
Permit Type: OAC Chapter 3745-31 Modification
Issued: 2/10/2011
Effective: 2/10/2011
Expiration: 1/28/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
Valero Renewable Fuels Company, LLC

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Authorization

Facility ID: 0124000132
Application Number(s): A0040930, A0041128
Permit Number: P0107511
Permit Description: Chapter 31 modification request to add a second truck loadout skid to allow for faster truck loading.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00
Issue Date: 2/10/2011
Effective Date: 2/10/2011
Expiration Date: 1/28/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Valero Renewable Fuels Company, LLC
3979 State Route 238 NE
Bloomingburg, OH 43106

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

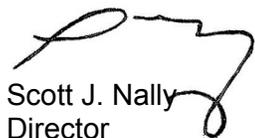
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107511
Permit Description: Chapter 31 modification request to add a second truck loadout skid to allow for faster truck loading.

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:	C0E09
Superseded Permit Number:	P0106079
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, Central 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 submitting¹ 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.

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).

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 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. J001, C0E09

Operations, Property and/or Equipment Description:

ethanol loadout rack to truck and rail; equipped with a flare

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. b)(1)b., c)(1), d)(1), e)(3), and f)(1)c.

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 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions shall not exceed 8.19 lbs/hr.</p> <p>No visible emissions from the loadout flare stack except for periods not to exceed a total of 5 minutes during any 120 consecutive minutes.</p> <p>See b)(2)a. through b)(2)e.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)f.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for VOC)	<p>VOC emissions shall not exceed 6.31 tons per rolling, 12-month period.</p> <p>See c)(1).</p>

- (2) Additional Terms and Conditions
- a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of top submerged fill or bottom fill and venting 100% of the vapors to a flare. BAT also includes compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - b. The hourly VOC emissions limitation was established to reflect the potential to emit for this emissions unit as vented to a flare. The monitoring and/or recordkeeping requirements for the flare as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.
 - c. Except where specifically identified for truck, the permittee shall comply with the following requirements during ethanol loadout to truck and rail:
 - i. During any transfer of material through the loading rack, 100% of the vapors displaced from the delivery vessel shall be vented to a flare;
 - ii. The loading rack shall utilize top submerged filling or bottom filling for the transfer of materials;
 - iii. All material loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight;
 - iv. A vapor tight lid shall be placed onto truck's fill point before loading operations; and
 - v. The vapor head space in the truck's tank shall be evacuated through a solid vapor line then routed to the flare.
 - d. The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and operations manual. The flare shall be operated at all times when emissions are vented to it and in compliance with the following requirements:
 - i. The flare shall be designed for and operated with no visible emissions as determined by U.S. EPA Method 22, except for periods not to exceed a total of 5 minutes during any 120 consecutive minutes.
 - (a) The flare shall be operated with either a pilot flame or an electric arc ignition system.
 - (i) If a pilot flame is employed, the flame shall be present at all times and shall be monitored with a thermocouple or other equivalent device to detect the presence of the pilot flame.
 - (ii) If an electric arc ignition system is employed, the arcing shall pulse continually and shall be monitored to detect any failure.

- ii. The flare shall be steam-assisted, air-assisted or nonassisted.
 - iii. The net heating value of the gas being combusted in a steam-assisted or air-assisted flare shall be 300 Btu/scf or greater, as determined by the method specified in OAC rule 3745- 21-10(P)(2);
 - iv. The net heating value of the gas being combusted in a nonassisted flare shall be 200 Btu/scf or greater, as determined by the method specified in OAC rule 3745- 21-10(P)(2).
 - v. The flare shall be designed and operated with an actual exit velocity of less than 60 feet per second, as determined by the method specified in OAC rule 3734-21-10(P)(3), if the flare is steam-assisted or nonassisted; or shall be designed and operated with an actual exit velocity less than the maximum permitted velocity determined per OAC rule 3734-21-10(P)(4) if the flare is air-assisted; with the following exceptions where a steam-assisted or nonassisted flare meets both of the following requirements:
 - (a) the net heating value of the gas being combusted in the flare, as determined by the method specified in OAC rule 3745-21-10(P)(2), is greater than 1,000 Btu/scf; and
 - (b) the flare is designed and operated with an actual exit velocity, as determined by the method specified in OAC rule 3745-21-10(P)(3), less than 400 feet per second.
 - e. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.
 - f. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions for this emissions unit because the uncontrolled potential to emit for OC emissions is less than ten tons per year.
- c) Operational Restrictions
- (1) All of the emissions from this emissions unit shall be vented to a flare.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to a flare.
 - b. the rolling, 12-month summation of denatured ethanol loaded to truck, in gallons;
 - c. the rolling, 12-month summation of denatured ethanol loaded to rail, in gallons; and
 - d. the rolling, 12-month summation of VOC emissions from emissions unit J001, in tons, calculated in accordance with the testing requirements for this emissions unit.
- (2) The permittee shall perform daily checks, when this 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 location and 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 eliminate the abnormal visible emissions.
- (3) 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 permittees to apply for and obtain a new or modified PTIO 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 PTIO.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (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.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter 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. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to a flare; and
 - ii. each rolling, 12-month period during which the VOC emissions for emissions unit J001 exceeded 6.31 tons;
- 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.
- (4) 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 (Central District Office).
- f) Testing Requirements
- (1) Compliance with the emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:

No visible emissions from the loadout flare stack except for periods not to exceed a total of 5 minutes during any 120 consecutive minutes (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

b. Emissions Limitation:

VOC emissions shall not exceed 8.19 lbs/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

Compliance may be demonstrated in accordance with the following equation:

$$\text{VOC} = (\text{VOC}_t + \text{VOC}_r)(1-\text{CE})$$

where,

VOC = Total VOC emissions per hour from truck and rail loadout;

$$\text{VOC}_t = L_t * \text{Ef}_t$$

VOC_t = Total VOC emissions per hour from truck loadout;

L_t = Maximum truck loadout rate (72,000 gal/hr);

Ef_t = AP-42[#] emission factor for truck loadout (0.00509 lb VOC/gal);

$$\text{VOC}_r = L_r * \text{Ef}_r$$

VOC_r = Total VOC emissions per hour from rail loadout;

L_r = Maximum rail loadout rate (84,000 gal/hr);

Ef_r = AP-42[#] emission factor for rail loadout (0.00051 lb VOC/gal); and

CE = Loadout flare control efficiency (98%)

The VOC emission factors for truck and rail loadout were calculated according to equation 1 of AP-42, Chapter 5.2, *Transportation and Marketing of Petroleum Liquids* (June, 2006).

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, method 18, 25 or 25A.

c. Emissions Limitation:

VOC emissions shall not exceed 6.31 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping required in d)(1) and the following equation:

$$\text{VOC} = [(\text{VOC}_T + \text{VOC}_R) * (1-\text{CE})]/2000$$

where,

VOC = Total VOC emissions per rolling, 12-month period from truck and rail loadout;

VOC_T = VOC emissions per rolling, 12-month period from truck loadout;

$$\text{VOC}_T = \text{GAL}_T * \text{EF}_T$$

GAL_T = gallons of denatured ethanol loaded to truck per rolling, 12-month period; and

EF_T = AP-42[#] emissions factor for truck loadout (0.00509 lb VOC/gal);

VOC_R = VOC emissions per rolling, 12-month period from rail loadout;

$$\text{VOC}_R = \text{GAL}_R * \text{EF}_R$$

GAL_R = gallons of denatured ethanol loaded to rail per rolling, 12-month period; and

EF_R = AP-42[#] emissions factor for rail loadout (0.00051 lb VOC/gal); and

CE = Loadout flare control efficiency (98%)

The VOC emission factors for truck and rail loadout were calculated according to equation 1 of AP-42, Chapter 5.2, *Transportation and Marketing of Petroleum Liquids* (June, 2006).

g) Miscellaneous Requirements

(1) None.