



Environmental Protection Agency

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

3/23/2011

Jason Mengel
BUCKEYE TERMINALS LLC CINCINNATI TERMINA
5TEK PARK
9999 HAMILTON BLVD
BREINIGSVILLE, PA 18031

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431073227
Permit Number: P0107820
Permit Type: Administrative Modification
County: Hamilton

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 |
| Yes | 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 Hamilton County Dept. of Environmental Services at (513)946-7777 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: HCDOES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
BUCKEYE TERMINALS LLC CINCINNATI TERMINA**

Facility ID: 1431073227
Permit Number: P0107820
Permit Type: Administrative Modification
Issued: 3/23/2011
Effective: 3/23/2011
Expiration: 3/23/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
BUCKEYE TERMINALS LLC CINCINNATI TERMINA

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Authorization

Facility ID: 1431073227
Application Number(s): M0001194
Permit Number: P0107820
Permit Description: Administrative modification to set 5 year permit cycle for Emissions Unit J001.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 3/23/2011
Effective Date: 3/23/2011
Expiration Date: 3/23/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BUCKEYE TERMINALS LLC CINCINNATI TERMINA
5150 River Rd
Cincinnati, OH 45233

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

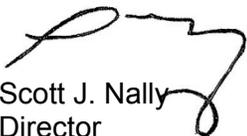
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107820

Permit Description: Administrative modification to set 5 year permit cycle for Emissions Unit J001.

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: | 4 lane truck loading rack |
| Superseded Permit Number: | P0107642 |
| 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 Hamilton County Dept. of Environmental Services in accordance

with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by 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.

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.

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).

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) 2., 3., 4., and 5.
2. The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emission units B002 (20 mmBtu/hr oil heater), J001 (loading rack), R001 (tank truck loading rack), T001 (40,000 bbl. fixed roof storage tank w/submerged fill), T002 (20,000 bbl. fixed roof storage tank w/submerged fill), T003 (25,000 bbl. fixed roof storage tank w/submerged fill), T004 (25,000 BBL. fixed roof storage tank w/submerged fill), T005 (5,000 BBL. fixed roof storage tank w/submerged fill), T006 (5,000 BBL. fixed roof storage tank w/submerged fill), T007 (2,500 BBL. fixed roof storage tank w/submerged fill), T008 (2,500 bbl. fixed roof storage tank w/submerged fill), T009 (2,500 bbl. fixed roof storage tank w/submerged fill), T010 (2,500 bbl. fixed roof storage tank w/submerged fill), T011 (2,500 bbl. fixed roof storage tank w/submerged fill), T013 (42,000 gal. floating roof petro tank), T014 (2.73 MM gallon storage tank), T015 (1.26 MM gallon storage tank), T016 (2.10 MM gallon storage tank), T017 (1.26 MM gallon storage tank), T018 (1.26 MM gallon storage tank), T019 (2.10 MM gallon storage tank), T020 (0.63 MM gallon storage tank) including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall maintain the following monthly records for all of the emissions units at this facility:
 - c) The total individual HAP emissions for each HAP, in tons
 - d) The total combined HAPs emissions, in tons (the sum of a).
 - e) The updated rolling, 12-month summation of the total individual HAP emissions for each HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months.
 - f) The updated rolling, 12-month summation of the total combined HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
4. The permittee shall submit quarterly deviation (excursion) reports for in the emissions units or air contaminant sources listed in 2. above that identify the following:
 - 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:

See emission limitations in 2. above;

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- 5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

- a) Emission Limitations:

The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emission units B002 (20 mmBtu/hr oil heater), J001 (loading rack), R001 (tank truck loading rack), T001 (40,000 bbl. fixed roof storage tank w/submerged fill), T002 (20,000 bbl. fixed roof storage tank w/submerged fill), T003 (25,000 bbl. fixed roof storage tank w/submerged fill), T004 (25,000 BBL. fixed roof storage tank w/submerged fill), T005 (5,000 BBL. fixed roof storage tank w/submerged fill), T006 (5,000 BBL. fixed roof storage tank w/submerged fill), T007 (2,500 BBL. fixed roof storage tank w/submerged fill), T008 (2,500 bbl. fixed roof storage tank w/submerged fill), T009 (2,500 bbl. fixed roof storage tank w/submerged fill), T010 (2,500 bbl. fixed roof storage tank w/submerged fill), T011 (2,500 bbl. fixed roof storage tank w/submerged fill), T013 (42,000 gal. floating roof petro tank), T014 (2.73 MM gallon storage tank), T015 (1.26 MM gallon storage tank), T016 (2.10 MM gallon storage tank), T017 (1.26 MM gallon storage tank), T018 (1.26 MM gallon storage tank), T019 (2.10 MM gallon storage tank), T020 (0.63 MM gallon storage tank) including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.

C. Emissions Unit Terms and Conditions



1. J001, 4 lane truck loading rack

Operations, Property and/or Equipment Description:

4 lane truck loading rack with vapor combustion unit.

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.

Table with 3 columns: Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists three rows of requirements and measures for VOC emissions.



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| d. | OAC rule 3745-21-09(Q) | See c)(1) – c)(4), c)(11) and c)(13). The VOC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart XX and OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The total VOC emissions from this emissions unit shall not exceed 51 TPY based on a rolling, 12-month summation.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a thermal incinerator (vapor combustion unit) and compliance with the emission limitations.

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.
 - 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. 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) A means shall be provided 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 disconnected.
- (4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (5) The design of the system shall prevent vapors (total organic compounds) collected at one loading rack from passing to another.
- (6) Gasoline loadings shall be made only into gasoline tank trucks equipped with vapor collection equipment compatible with the terminal's vapor collection system.

- (7) The terminal's and the tank truck's vapor collection systems shall be connected during each loading of a gasoline tank truck at this emissions unit. This may include training drivers in the hook-up procedures and posting visible reminder signs at this emissions unit.
 - (8) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4500 pascals (450 mm of water) during product loading. This level shall not be exceeded when measured by the procedures specified in 40 CFR 60.503(d).
 - (9) No pressure-vacuum vent in the terminal's vapor collection system shall begin to open at a system pressure less than 4500 pascals (450 mm of water).
 - (10) Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
 - a. Obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck loaded at this emissions unit.
 - b. Require the tank identification number to be recorded as each gasoline tank truck is loaded at this emissions unit.
 - c. Cross-check each tank identification number obtained in Section b)(10)b. above with the file for tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
 - d. Notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at this emissions unit within 3 weeks after the loading has occurred.
 - e. Not allow the reloading of nonvapor-tight gasoline trucks at this emissions unit until the vapor tightness documentation for the truck is obtained.
 - (11) The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
 - (12) The average combustion temperature within the thermal incinerator (vapor combustion unit), for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - (13) The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100% 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 maintain monthly records of the following information for this emissions unit :
 - a. The identification of each material loaded.
 - b. The amount in gallons of each material loaded.

- c. The vapor pressure of each material loaded, in psia.
 - d. The molecular weight of each material loaded, in lb/lb-mole.
 - e. The total monthly VOC emissions from this emissions unit, in tons.
 - f. The rolling, 12-month summation of the total VOC emissions from this emissions unit, in tons.
- (2) The permittee shall properly operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (3) The permittee shall maintain records, at the terminal, of the tank truck vapor tightness documentation required under Section c)(10)a, in accordance with 40 CFR 60.505(b). The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by 40 CFR Part 60, Appendix A, Method 27.
- (4) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. The record of each monthly leak inspections shall include the following at a minimum:
- a. Date of inspection.
 - b. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
 - c. Leak determination method.
 - d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

(5) Inspector name and signature.

e) Reporting Requirements

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

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, 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:

b)(2)a. and d)(1)f.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in c)(12).

(4) The permittee shall submit an annual report which specifies the total VOC emissions from this emissions unit for the previous calendar year. This report shall be submitted by January 31 of each year.

f) Testing Requirements

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

a. The emission testing shall be conducted within 2.5 years after the issuance of this permit and also within 6 months prior to the expiration of this permit.

- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limit of 0.29 pound of VOC per 1000 gallons loaded.
- c. The compliance test methods and procedures for the emission test for this emission unit shall follow those specified in OAC rule 3745-21-10(E) and 40 CFR 60.503.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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).

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.

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).

- (2) Compliance with the emission limitations specified in b)(2)a and b)(2)b may be demonstrated by use of the following methods:
 - a. VOC emissions when loading out distillates (uncontrolled) shall be determined Using AP-42, 5th Edition, Chapter 5.2, June 2008.
 - b. The VOC emissions from the load out of gasoline (controlled) through the loading rack shall be calculated by adding the controlled emissions from the VCU to the fugitive emissions from the loading process. The controlled VOC emissions from the load out off gasoline through the truck loading rack shall be calculated by multiplying the mg/l emission rate determined during the most recent stack test that demonstrated compliance by the throughput of gasoline. A capture efficiency of 98.7 % by weight shall be used for calculating the fugitive VOC emissions from the load out of gasoline through the loading rack.
 - c. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "protocol for Equipment Leak Emission Estimates."



- (3) Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Hamilton County Division of Environmental Services and Buckeye Terminals LLC.

- g) Miscellaneous Requirements
 - (1) None.