Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

7/20/2011

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)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Paul Siler
TransMontaigne Operating Company, L.P.
1670 Broadway Suite 3100
Denver, CO 80202

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

Facility ID: 0215020249
Permit Number: P0108290
Permit Type: OAC Chapter 3745-31 Modification
County: Columbiana

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Morning Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; West Virginia

Permit Strategy Write-Up

1. Check all that apply:

   xSynthetic Minor Determination

   Netting Determination

2. Source Description:

   Facility receives, stores and dispenses liquid material (organic and inorganic). Material comes in from barges or trucks and transferred to a storage tank. Material goes out from a storage tank and transferred to a truck or barge.

3. Facility Emissions and Attainment Status:

   TransMontaigne Operating Company, L.P. – East Liverpool Terminal is an area source for HAPs and minor source for criteria pollutants. Compliance with the requirements in the permit will assure that the facility stays under Title V threshold levels.

   TransMontaigne is located at 425 River Road, East Liverpool Ohio in Columbiana County. Columbiana County is currently evaluated as “attainment” for carbon monoxide, lead, nitrogen dioxide, PM10, PM2.5, PM10 and ozone. Ohio Attainment status for sulfur dioxide not yet designated, as of 6/24/11.

4. Source Emissions:

   This permit includes all emissions units at the facility. There are 11 tanks and 6 loading racks. Emissions are primarily volatile organic compounds.

5. Conclusion:

   TransMontaigne proposes to limit its overall facility throughput of gasoline or lower vapor pressure product, and of distillate fuel oil No. 2 or lower vapor pressure product, to assure that facility emissions do not exceed Title V thresholds.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOCs	89.65

Columbiana County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
TransMontaigne Operating Company, L.P.

Issue Date: 7/20/2011
Permit Number: P0108290
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: The is a Chapter 31 modification involving all the emissions units (storage tanks and loading docks) at the facility. TransMontaigne proposes to include gasoline as a product to store and handle. They also propose to limit its overall facility throughput of gasoline or lower vapor pressure product, and of distillate fuel No. 2 or lower vapor pressure product, to assure that facility emissions do not exceed Title V thresholds.
Facility ID: 0215020249
Facility Location: TransMontaigne Operating Company, L.P.
425 RIVER RD,
EAST LIVERPOOL, OH 43920
Facility Description: Other Warehousing and Storage

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Pamela Korenewych at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 or (330)425-9171. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
TransMontaigne Operating Company, L.P.

Facility ID:	0215020249
Permit Number:	P0108290
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	7/20/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
TransMontaigne Operating Company, L.P.

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Authorization

Facility ID: 0215020249
Application Number(s): A0042085
Permit Number: P0108290
Permit Description: The is a Chapter 31 modification involving all the emissions units (storage tanks and loading docks) at the facility. TransMontaigne proposes to include gasoline as a product to store and handle. They also propose to limit its overall facility throughput of gasoline or lower vapor pressure product, and of distillate fuel No. 2 or lower vapor pressure product, to assure that facility emissions do not exceed Title V thresholds.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $8,100.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/20/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

TransMontaigne Operating Company, L.P.
425 RIVER RD
EAST LIVERPOOL, OH 43920

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0108290
Permit Description: The is a Chapter 31 modification involving all the emissions units (storage tanks and loading docks) at the facility. TransMontaigne proposes to include gasoline as a product to store and handle. They also propose to limit its overall facility throughput of gasoline or lower vapor pressure product, and of distillate fuel No. 2 or lower vapor pressure product, to assure that facility emissions do not exceed Title V thresholds.

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

Emissions Unit ID:	**J005**
Company Equipment ID:	Loading Rack #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J006**
Company Equipment ID:	Barge Dock
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Fixed Cone Roof Tanks

Emissions Unit ID:	**T001**
Company Equipment ID:	Storage Tank #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T002**
Company Equipment ID:	Storage Tank #2
Superseded Permit Number:	P0012243
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	Storage Tank #3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T004**
Company Equipment ID:	Storage Tank #4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T011**
Company Equipment ID:	Storage Tank #11
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Internal Floating Roof Tanks

Emissions Unit ID:	**T005**
Company Equipment ID:	Storage Tank #5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Storage Tank #6
Superseded Permit Number:	

General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T007**
Company Equipment ID:	Storage Tank #7
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T008**
Company Equipment ID:	Storage Tank #8
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T009**
Company Equipment ID:	Storage Tank #9
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T010**
Company Equipment ID:	Storage Tank #10
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Racks: Uncontrolled

Emissions Unit ID:	**J001**
Company Equipment ID:	Loading Rack #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**J002**
Company Equipment ID:	Loading Rack #2
Superseded Permit Number:	02-14761
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**J003**
Company Equipment ID:	Loading Rack #3
Superseded Permit Number:	02-14761
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**J004**
Company Equipment ID:	Loading Rack #4
Superseded Permit Number:	02-14761
General Permit Category andType:	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, Northeast 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.

[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) Allowable Facility-Wide Emission Limitation:

         a. Volatile organic compound (VOC) emissions shall not exceed 89.65 tons per rolling, 12-month period.

      (2) Operational Restrictions:

         a. The overall throughput of gasoline or lower vapor pressure product for storage in the tanks with an internal floating roof shall not exceed 200,000,000 gallons per rolling, 12-month period.*

         b. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for storage in any of the tanks shall not exceed 200,000,000 gallons per rolling, 12-month period.*

         c. The overall throughput of gasoline or lower vapor pressure product for truck loading shall not exceed 100,000,000 gallons per rolling, 12-month period.

         d. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for truck loading shall not exceed 100,000,000 gallons per rolling, 12-month period.

         e. The overall throughput of gasoline or lower vapor pressure product for barge loading shall not exceed 100,000,000 gallons per rolling, 12-month period.

         f. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for barge loading shall not exceed 100,000,000 gallons per rolling, 12-month period.

         g. The vapor control unit (VCU) shall be operated whenever gasoline is loaded into a truck or barge.

         *Storage throughputs include tank-to-tank transfers.

      (3) Monitoring and/or Recordkeeping Requirements:

         a. The permittee shall collect and record the following information each month:

i. the overall throughput of gasoline or lower vapor pressure product in the tanks with an internal floating roof;

ii. the overall throughput of distillate fuel oil No. 2 or lower vapor pressure product in any of the tanks;

iii. the throughput of gasoline or lower vapor pressure product loaded into trucks;

iv. the throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into trucks;

v. the throughput of gasoline or lower vapor pressure product loaded into barges;

vi. the throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into barges;

vii. the rolling, 12-month throughput of gasoline or lower vapor pressure product in the tanks with an internal floating roof, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;

viii. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product in the tanks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;

ix. the rolling, 12-month throughput of gasoline or lower vapor pressure product loaded into trucks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;

x. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into trucks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;

xi. the rolling, 12-month throughput of gasoline or lower vapor pressure product loaded into barges, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months; and

xii. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into barges, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months.

b. The permittee shall record any time when the VCU was not in operation when gasoline was loaded into a truck or barge. The record shall include the date, time, duration and reason.

(4) Reporting Requirements:

a. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

i. an identification of any month when any of the rolling, 12-month throughput limitations as specified in B.1.b)(2) are exceeded;

ii. the actual throughput for the limitation that was exceeded; and

iii. an identification of any month when the VCU was not in operation when gasoline was loaded into a truck or barge.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

(5) Testing Requirements:

a. Compliance with the facility-wide VOC emission limitation of 89.65 tons per rolling, 12-month period is assumed if the throughput limitations in B.1.b)(2) are not exceeded.

c) The Ohio EPA has determined that this facility is subject to the requirements of an area source MACT/GACT rule (40 CFR Part 63, Subpart BBBBBB) that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:

http://www.epa.gov/ttn/atw/area/arearules.html

C. Emissions Unit Terms and Conditions

1. J005, Loading Rack #5

Operations, Property and/or Equipment Description:

Truck Loading Rack #5

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.

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 on 11/30/01	Requirements of this rule shall be equivalent to the (more stringent) requirements of OAC rule 3745-21-09(Q) and 40 CFR 60, Subpart XX. See b)(2)a, b)(2)b, b)(2)k, b)(2)l and c)(1).
b.	OAC rule 3745-31-05(A)(3) as effective on 12/01/06	See b)(2)a, b)(2)b, b)(2)m and c)(1).
c.	OAC rule 3745-31-05(D)(1)(b)	See B.1.b)(2) under Facility-Wide Terms and Conditions.
d.	OAC rule 3745-21-09(Q)	See c)(2) through c)(7), d)(1), d)(2) and e)(1). The requirement of OAC rule 3745-21-09(Q)(1)(b)(ii) is less stringent than the requirement of §60.502(b) in 40 CFR Part 60, Subpart XX.

e.	40 CFR Part 60, Subpart XX	New Source Performance Standards for Bulk Gasoline Terminals See b)(2)c through b)(2)j, d)(3) through d)(8) and f)(1) through f)(3).

(2) Additional Terms and Conditions

a. The permittee shall operate a vapor collection system and vapor control unit (VCU) when loading high vapor pressure product. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi).

b. The VCU shall be operated according to the manufacturer's recommended operating guidelines, during loading of high vapor pressure product as defined in b)(2)a.

c. This loading rack, J005, shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during high vapor pressure product (as defined in b)(2)a) loading, and vent them to the VCU.

d. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks, i.e., emissions from the VCU, shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

e. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at J005 from passing to J006, or from J006 to J005.

f. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

i. The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded.

ii. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded.

iii. The permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

(a) if less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed each quarter; or

(b) if less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

If either the quarterly or semiannual cross-check reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

iv. The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at this loading rack within 1 week of the documentation cross-check.

v. The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the loading rack until vapor tightness documentation for that tank is obtained.

vi. Alternate procedures to those described above for limiting gasoline tank truck loadings may be used upon application to, and approval by, U.S. EPA.

g. The permittee shall act to assure that loadings of gasoline tank trucks at this loading rack are made only into tanks equipped with vapor collection equipment that is compatible with the permittee's vapor collection system.

h. The permittee shall act to assure that the loading rack's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading rack.

i. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

j. No pressure-vacuum vent in the vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

k. Emissions of nitrogen oxides (NO_x) and carbon monoxide (CO) from the combustion of vapors in the VCU shall not exceed 3.34 tons per year and 8.35 tons per year, respectively.

l. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State

Implementation Plan (SIP). Therefore, until the SIP revision occurs and the 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. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then the NOx and CO emissions limitations no longer apply.

m. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and CO emissions from the VCU specified in b)(2)k because they are less than 10 tons/year.

c) Operational Restrictions

(1) This loading rack, J005, shall transfer gasoline or lower vapor pressure product; or liquid fertilizer, to trucks, by submerged filling.

(2) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:

a. all vapors displaced from the *delivery vessel during loading are vented only to the vapor collection system; and

b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches or water gauge pressure.

*Delivery vessel" is defined in OAC rule 3745-21-01(H)(6) as "a tank truck, a tank equipped trailer, a railroad tank car, or other mobile source, except ship or barge, equipped with a storage tank used for the transport of gasoline from a source of supply to stationary tanks at a gasoline dispensing facility or bulk gasoline plant."

(3) The loading rack shall be equipped with a vapor control unit (VCU) whereby:

a. all vapors collected by the vapor collection system are vented to the VCU; and

b. any liquid gasoline returned to a stationary storage tank from the VCU is free of entrained air to the extent possible with good engineering design.

(4) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(5) All gasoline lines and vapor lines shall be equipped with fittings which are *vapor tight.

*OAC rule 3745-21-01(H)(22) defines "vapor tight" as free of any vapor leaks to the extent possible based upon good engineering design and practice.

(6) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

(7) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

(2) The permittee shall monitor all potential sources of vapor leaks from the terminal's vapor collection system and vapor control system while a gasoline tank truck is being loaded. Where vapor leaks are determined to be equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10, the permittee shall maintain a record of the following information:

a. the date the leak was detected;

b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;

c. the leak detection method;

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and

f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

(3) Each calendar month, the vapor collection system, the vapor processing system, and this 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.

(4) The tank truck vapor tightness documentation required in 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

(5) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum the following information:

a. test title: Gasoline Delivery Tank Pressure Test – EPA Reference Method 27;

b. tank owner and address;

c. tank identification number;

d. testing location;

e. date of test;

f. tester name and signature;

g. witnessing inspector, if any: name, signature, and affiliation; and

h. test results: actual pressure change in 5 minutes, mm of water (average of 2 runs).

(6) A record of each monthly leak inspection required in 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

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); and

e. inspector name and signature.

(7) The permittee shall keep documentation of all notifications required in 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years.

(8) The permittee shall keep records of all replacements or additions of components performed on the vapor processing system for at least 3 years.

(9) The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the VCU. The PMP shall include an annual inspection by a qualified individual. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the Ohio EPA.

(10) The permittee shall maintain the data required by the VCU manufacturer's recommended daily operating guidelines.

e) Reporting Requirements

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

(2) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in sections b)(2)d and b)(2)k of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation</u>:

The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks, i.e., emissions from the VCU, shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

<u>Applicable Compliance Method</u>:

Compliance with this emission limitation shall be demonstrated through emissions testing, pursuant to f)(2).

b. <u>Emissions Limitation</u>:

Emissions of NO_x and CO from the combustion of vapors in the VCU shall not exceed 3.34 tons per year and 8.35 tons per year, respectively.

<u>Applicable Compliance Method</u>:

Compliance with the NO_x and CO emission limitations is assumed if compliance with the throughput limitations in B.1.b)(2) is achieved.

(2) Within 6 months after the effective date of this permit and within 6 months prior to the expiration of this permit, the permittee shall conduct or have conducted, emission tests for this emissions unit in order to demonstrate continuing compliance with the emission limitation.

a. Immediately before the performance test, the permittee shall use Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor

collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

b. The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

The three-run requirement of 40 CFR 60.8(f) does not apply.

c. If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

d. The emission rate (E) of total organic compounds shall be computed using the equation in 40 CFR 60.503(c)(3).

e. The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

f. The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:

   i. Method 2B shall be used for combustion vapor processing systems; and

   ii. Method 2A shall be used for all other vapor processing systems.

g. Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by U.S.EPA.

h. To determine the volume (L) of gasoline dispensed during the performance test period at this loading rack whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(3) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(2)i of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

<u>Applicable Compliance Method</u>:

Compliance with this standard shall be demonstrated as follows:

i. Immediately before the demonstration, the permittee shall use Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the demonstration.

ii. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

iii. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

g) Miscellaneous Requirements

(1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.

2. J006, Barge Dock

Operations, Property and/or Equipment Description:

Barge Loading Rack

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.

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 on 11/30/01	See b)(2)a through b)(2)g and c)(1) through c)(5).
b.	OAC rule 3745-31-05(A)(3) as effective on 12/01/06	See b)(2)a through b)(2)e, b)(2)h and c)(1) through c)(5).
c.	OAC rule 3745-31-05(D)(1)(b)	See B.2 under Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The loading rack shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from barges during product loading, and vent them to the vapor control unit (VCU) when loading high vapor pressure product. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi).

b. The VCU shall be operated according to the manufacturer's recommended operating guidelines, during loading of high vapor pressure product as defined in b)(2)a.

c. The emissions to the atmosphere from the VCU are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded into a barge;

d. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at J005 from passing to J006, or from J006 to J005.

e. The permittee shall limit the barge loading of gasoline to those barges that are vapor tight and are connected to the vapor collection system. A vapor tight vessel is one that has demonstrated within the preceding 12 months to have no leaks.

f. Emissions of nitrogen oxides (NO_x) and carbon monoxide (CO) from the combustion of vapors in the VCU shall not exceed 3.34 tons per year and 8.35 tons per year, respectively.

g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the 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. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then the NOx and CO emissions limitations no longer apply.

h. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and CO emissions from the VCU specified in b)(2)f because they are less than 10 tons/year.

c) Operational Restrictions

(1) This loading rack shall transfer gasoline or lower vapor pressure product; or liquid fertilizer, to barges, by submerged filling.

(2) The loading rack shall be equipped with a vapor collection system that vents vapors to a vapor control unit (VCU) whereby:

a. all vapors collected by the vapor collection system are vented to the VCU; and

b. any liquid gasoline returned to a stationary storage tank from the VCU is free of entrained air to the extent possible with good engineering design.

(3) The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All gasoline lines and vapor lines shall be equipped with fittings which are *vapor tight.

*OAC rule 3745-21-01(H)(22) defines "vapor tight" as free of any vapor leaks to the extent possible based upon good engineering design and practice.

(5) The permittee shall not permit gasoline to be spilled, discarded into sewers, stored in open containers, or handled in any other manner that would result in evaporation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain a documentation file for each barge loaded with gasoline or lower vapor pressure product, to reflect current vapor tightness test results. Each file shall include the following, as a minimum:

1) Test title; 2) barge owner and address; 3) barge identification number; 4) loading time; 5) testing location; 6) date of test; 7) tester name and signature; 8) test results; 9) if applicable, documentation showing that the repair of leaking components attributed to a failure of a vapor tightness test is technically infeasible without dry-docking the barge; and 10) if applicable, documentation that a barge failing a pressure test or leak test has been repaired.

Updates to each file shall be made at least one per year.

(2) If the owner or operator of a barge cannot provide documentation of vapor tightness prior to loading, the permittee shall ensure than the owner or operator performs a leak test of the barge during loading, using Method 21. If no leak is detected, the permittee shall ensure that the owner or operator of the barge completes the documentation described above. If a leak is detected, the permittee shall ensure that the owner or operator of the barge documents the vapor tightness failure prior to departure of the barge. The leaking component shall be repaired prior to the next barge loading operation at a controlled terminal unless the repoair is infeasible without cleaning and gas freeing or dry-docking the barge.

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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(2)c and b)(2)f of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The emissions to the atmosphere from the VCU are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded into a barge

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emissions testing.

Completion of emissions testing, as required for emissions unit J005 in this permit, will satisfy the testing requirement for this emissions unit.

b. Emission Limitations:

Emissions of NO_x and CO from the combustion of vapors in the VCU shall not exceed 3.34 tons per year and 8.35 tons per year, respectively.

Applicable Compliance Method:

Compliance with the NO_x and CO emission limitations is assumed if compliance with the throughput limitations in B.1.b)(2) is achieved.

g) Miscellaneous Requirements

(1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.

3. Emissions Unit Group -Fixed Cone Roof Tanks: T001,T002,T003,T004,T011,

EU ID	Operations, Property and/or Equipment Description
T001	Storage Tank #1, 56,000 BBLS (2,352,000 gallons), Steel Vertical Tank, 100'Dx40'H, Fixed Cone Roof, Submerged Fill
T002	Storage Tank #2, 24,200 BBLS (1,016,400 gallons), Steel Vertical Tank, 60'Dx48'H, Fixed Cone Roof, Submerged Fill
T003	Storage Tank #3, 24,200 BBLS (1,016,400 gallons), Steel Vertical Tank, 60'Dx48'H, Fixed Cone Roof, Submerged Fill
T004	Storage Tank #4, 35,800 BBLS (1,503,600 gallons), Steel Vertical Tank, 73'Dx48'H, Fixed Cone Roof, Submerged Fill
T011	Storage Tank #11, 720 BBLS (30,240 gallons), Steel Vertical Tank, 12'D x 35'H, Submerged fill, Fixed Cone Roof

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.

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)	Requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L) See c)(1) and c)(2).
b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 under Facility-Wide Terms and Conditions
c.	OAC rule 3745-21-09(L)	See b)(2)a, d)(1) and e)(1).
d.	40 CFR Part 60, Subpart Kb	Not Applicable. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in these fixed roof tanks any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or alternative equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

b. The requirements of 40 CFR Part 60, Subpart Kb do not apply to emissions units T001, T002, T003, T004 because each tank will store a liquid with a maximum true vapor pressure less than 3.5 kPa (0.506 psia).

c. T011 is exempt from permitting per OAC rule 3745-31-03(A)(1)(l)(v). However, it is included in this group because it will also hold only distillate fuel oil No. 2 or lower vapor pressure product; or liquid fertilizer, which allows this tank to qualify for the exemption.

c) Operational Restrictions

(1) The permittee shall hold distillate fuel oil No. 2 or lower vapor pressure product; or liquid fertilizer in emissions units T001, T002, T003, T004 and T011.

(2) The permittee shall employ submerged filling in emissions units T001, T002, T003, T004 and T011.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for each tank (T001, T002, T003, T004 and T011):

a. the types of petroleum liquids stored in the tank; and

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

These records shall be maintained for at least 5 years and shall be made available to the Director or his/her representative upon verbal or written request.

e) Reporting Requirements

(1) If the permittee places, stores, or holds, in any one of the fixed roof tanks, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Northeast District Office within 30 days of becoming aware of the occurrence. Such notification shall include the date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure and the proposed method of 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) None

g) Miscellaneous Requirements

(1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for these air contaminant sources.

4. Emissions Unit Group -Internal Floating Roof Tanks: T005,T006,T007,T008,T009,T010,

EU ID	Operations, Property and/or Equipment Description
T005	Storage Tank #5, 15,150 BBLS (636,300 gallons), Steel Vertical Tank, 52'Dx40'H, Submerged Fill, Internal Floating Roof
T006	Storage Tank #6, 16,800 BBLS (705,600 gallons), Steel Vertical Tank, 50'Dx48'H, Submerged Fill, Internal Floating Roof
T007	Storage Tank #7, 16,800 BBLS (705,600 gallons), Steel Vertical Tank, 50'Dx48'H, Submerged Fill, Internal Floating Roof
T008	Storage Tank #8, 16,800 BBLS (705,600 gallons), Steel Vertical Tank, 50'Dx48'H, Submerged Fill, Internal Floating Roof
T009	Storage Tank #9, 10,800 BBLS (453,600 gallons), Steel Vertical Tank, 40'Dx48'H, Submerged Fill, Internal Floating Roof
T010	Storage Tank #10, 10,800 BBLS (453,600 gallons), Steel Vertical Tank, 40'Dx48'H, Submerged Fill, Internal Floating Roof

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.

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)	Requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb. See c)(1), c)(2) and c)(3).

b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 under Facility-Wide Terms and Conditions
b.	OAC rule 3745-21-09(L)	See c)(4), d)(1), d)(2) and e)(1).
c.	40 CFR Part 60, Subpart Kb	See b)(2)a, d)(1), d)(3) through d)(9), e)(2) through e)(4) and g)(1).

(2) Additional Terms and Conditions

a. The permittee shall maintain a fixed roof in combination with an internal floating roof meeting the following specifications, while storing high vapor pressure product. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi):

i. the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible;

ii. each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) a foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous

(c) a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof;

iii. each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface;

iv. each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;

v. automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;

vi. rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;

vii. each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;

viii. each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and

ix. each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

c) Operational Restrictions

(1) The permittee shall hold gasoline or lower vapor pressure product; or liquid fertilizer in emissions units T005, T006, T007, T008, T009 and T010. Only unleaded gasoline in these tanks is allowed. Any changes in the fuel may be deemed a “modification” to an emissions unit and, as such, prior notification to and approval from the Ohio EPA Northeast District Office, Division of Air Pollution Control, is required.

(2) Emissions units T007 and T008 shall be equipped with electric heating for when they hold low vapor pressure products. The low vapor pressure product shall not be heated to a vapor pressure greater than gasoline with an RVP of 13.5 psia at ambient temperature.

(3) The permittee shall employ submerged filling in emissions units T005, T006, T007, T008, T009 and T010.

(4) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers, prior to storing high vapor pressure product as follows. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi):

a. each fixed roof storage tank shall be equipped with an internal floating roof;

b. the automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports;

c. the rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports; and

d. all openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

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

a. the types of petroleum liquids stored in each tank;

b. the period of storage; and

c. 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.

These records shall be maintained for at least 5 years and shall be made available to the Director or his/her representative upon verbal or written request.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules, while storing high vapor pressure product. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi).

(3) The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

(4) For tanks equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA Northeast District Office in the inspection report required in §60.115b(a)(3). Such a request for an extension must

document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

(5) For tanks equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B), the permittee shall visually inspect the tank as specified in §60.113b(a)(4) at least every 5 years; or as specified in §60.113b(a)(2);

(6) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in §60.113b(a)(3)(i);

(7) The permittee shall keep a record of each inspection performed as required by 60.113b(a). Each record shall identify the storage vessel on which the inspection and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

(8) The permittee shall keep copies of all records required by 40 CFR Part 60, Subpart Kb, except for the record required by §60.116b(b), for at least 2 years.

(9) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record will be kept for the life of the emissions unit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

(2) The permittee shall notify the Ohio EPA Northeast District Office in writing at least 30 days prior to the filling or refilling with high vapor pressure product, of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Ohio EPA Northeast District Office the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Ohio EPA Northeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by

express mail so that it is received by the Ohio EPA Northeast District Office at least 7 days prior to the refilling. High vapor pressure product is defined as a product with a Reid vapor pressure between that for distillate fuel oil No. 2 and that for gasoline (maximum of 13.5 psi).

(3) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

(4) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Ohio EPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.

(5) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below:

a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

b. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:

i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage

temperature determined, and the Reid vapor pressure determined from the sample(s).

ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

c. For other liquids, the vapor pressure:

i. may be obtained from standard reference texts; or

ii. determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or

iii. measured by an appropriate method approved by the Administrator; or

iv. calculated by an appropriate method approved by the Administrator.

(2) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for these air contaminant sources.

5. Emissions Unit Group -Racks: Uncontrolled: J001,J002,J003,J004,

EU ID	Operations, Property and/or Equipment Description
J001	Truck Loading Rack #1
J002	Truck Loading Rack #2
J003	Truck Loading Rack #3
J004	Truck Loading Rack #4

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.

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)	See b)(2)a and c)(1).
b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 under Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. All loading lines shall be equipped with fittings which are vapor tight.

c) Operational Restrictions

(1) Each loading rack shall only transfer distillate fuel oil No. 2 or lower vapor pressure product; or liquid fertilizer by submerged filling.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) None

g) Miscellaneous Requirements

(1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for these air contaminant sources.