



Environmental
Protection Agency

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

8/30/2011

Nicholas Frosini
Buckeye Terminals LLC - Cleveland Plant
c/o 5 Tek Park
9999 Hamilton Blvd
Breinigsville, PA 18031

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318002740
Permit Number: P0107378
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

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 Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Cleveland Plant**

Facility ID:	1318002740
Permit Number:	P0107378
Permit Type:	Renewal
Issued:	8/30/2011
Effective:	8/30/2011
Expiration:	8/30/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
Buckeye Terminals LLC - Cleveland Plant

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Authorization

Facility ID: 1318002740

Application Number(s): A0025929, A0040721

Permit Number: P0107378

Permit Description: Administrative Modification done as a renewal to include a 13.16 TPY of VOC limit for all roof landing losses for Tanks 1 through 6. and to decrease the gasoline truck rack loading limit from 600,000,000 gals per year to 300,000,000 gals per year resulting in a decrease of 36.28 tons of potential VOC. Renewed terms for the gasoline loading rack equipped with VRU and eight related storage tanks. All units previously permitted under a FESOP (P0094420) that was issued 12/30/99.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 8/30/2011

Effective Date: 8/30/2011

Expiration Date: 8/30/2016

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Buckeye Terminals LLC - Cleveland Plant
2201 WEST THIRD ST
Cleveland, OH 44113

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0107378

Permit Description: Administrative Modification done as a renewal to include a 13.16 TPY of VOC limit for all roof landing losses for Tanks 1 through 6. and to decrease the gasoline truck rack loading limit from 600,000,000 gals per year to 300,000,000 gals per year resulting in a decrease of 36.28 tons of potential VOC. Renewed terms for the gasoline loading rack equipped with VRU and eight related storage tanks. All units previously permitted under a FESOP (P0094420) that was issued 12/30/99.

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: Truck Loading Rack Controlled by a VRU
Superseded Permit Number: P0094420
General Permit Category and Type: Not Applicable

Emissions Unit ID: T010
Company Equipment ID: TANK 23
Superseded Permit Number: P0094420
General Permit Category and Type: Not Applicable

Emissions Unit ID: T011
Company Equipment ID: TANK 24
Superseded Permit Number: P0094420
General Permit Category and Type: Not Applicable

Group Name: Six (6) ASTs equipped with IFRs

Table with 2 columns: Emissions Unit ID and details (Company Equipment ID, Superseded Permit Number, General Permit Category and Type). Rows include T001 through T006.

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 Cleveland Division of Air Quality 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.

¹Permittees 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.

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.

(2) b), c), d), f), and g)

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(D) FEPTIO to avoid Title V and MACT applicability.	See b)(2)a.

(2) Additional Terms and Conditions

a. The total combined annual emissions from all facility emissions units, including permit to install and operate exempt and "de minimis" emissions units, shall not exceed the following as rolling, 12- month summations:

- i. 80 tons of volatile organic compounds (VOC);
- ii. 3 tons of combined hazardous air pollutants (HAPs); and
- iii. 1 ton of individual HAP.

c) Operational Restrictions

(1) None.

d) Monitoring and Recordkeeping Requirements

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

- a. the calculated, total VOC and HAP (individual and combined HAPs) emissions (in tons), and;
- b. the rolling, 12-month summations of VOC and HAP (individual and combined HAPs) emissions (in tons) from gasoline, distillates, Jet A, additives and interface (pipeline transmix) for all emission units at the facility, in tons.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month VOC emission limitation of 80 tons;
 - ii. the rolling, 12-month individual HAP emissions limitation of 1 tons; and
 - iii. the rolling, 12-month combined HAPs emissions limitation of 3 tons.
- 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).

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

80 tons per year of VOC as a rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to d)(1) above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

- i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" or equivalent program.
- ii. 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."
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).
- iv. The VOC emissions from gasoline truck loading shall be determined, using AP- 42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99.2 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

b. Emission Limitations:

3 tons of combined HAPs per rolling, 12-month summation from all facility emissions units

1 tons of any individual HAP per rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with these emission limitations shall be based upon the records required pursuant to d)(1) above.

To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in b)(1), the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in pounds per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline.

- i. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
 - (a) 2,2,4 trimethylpentane – 0.00560 pound of 2,2,4 trimethylpentane per pound VOC emissions;

- (b) 1,3 butadiene – 0.00004 pound of butadiene emissions per pound of VOC emissions;
 - (c) benzene - 0.00253 pound of benzene emissions per pound of VOC emissions
 - (d) cumene – 0.00010 pound of cumene emissions per pound of VOC emissions;
 - (e) ethyl benzene - 0.00086 pound of ethyl benzene emissions per pound of VOC emissions
 - (f) hexane - 0.00663 pound of hexane emissions per pound of VOC emissions
 - (g) methyl tert-butyl ether (MTBE) - 0.01195 pound of MTBE emissions per pound of VOC emissions ;
 - (h) naphthalene – 0.00010 pound naphthalene emissions per pound of VOC emission;
 - (i) styrene – 0.00003 pound of styrene emissions per pound of VOC emissions;
 - (j) toluene - 0.00604 pound of toluene emissions per pound of VOC emissions;
 - (k) xylene - 0.00333 pound of xylene emissions per pound of VOC emissions; and
 - (l) formaldehyde – 0.00001 pound of formaldehyde emissions per pound of VOC emissions.
- ii. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
 - iii. 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 Cleveland Division of Air Quality and the permittee.
- g) Miscellaneous Requirements
- (1) The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule 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) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has 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 follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>

C. Emissions Unit Terms and Conditions

1. J001, Truck Loading Rack Controlled by a VRU

Operations, Property and/or Equipment Description:

Truck loading rack for gasoline, distillates, Jet A, additives and interface (pipeline transmix) controlled with a carbon absorption/gasoline absorption vapor recovery unit (VRU).

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)a., c)(1), d)(1), e)(2) and f)(1).

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(D) Synthetic Minor to avoid Title V and MACT applicability.	Gasoline loading Controlled by Vapor Recovery Unit (VRU) (i.e., gasoline, additives and interface): 0.167 pound of volatile organic compounds (VOC) per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel and 25.0 tons of VOC per year. Gasoline loading (fugitive losses): 0.075 pound of VOC per 1,000 gallons (9 mg/l) of gasoline loaded into the delivery vessel and 11.26 tons of VOC per year. The total annual VOC emissions from this emissions unit shall not exceed 36.26 tons per year as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q).
b.	OAC rule 3745-21-09(Q)	The VOC emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) Compliance with the emission limitations as specified in Section b)(1)a. shall be achieved by restricting the annual throughput of refined petroleum product (i.e., gasoline, distillates, Jet A, additives and interface (pipeline transmix)). The annual throughput of refined petroleum product shall not exceed 300,000,000 gallons based upon a rolling, 12-month summation of the product throughput amounts.
- (2) The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any product into tank trucks.
- (3) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- (4) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system;
 - b. the mass emissions of VOC from the vapor control system do not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel; and
 - c. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

- (5) 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.
- (6) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (7) 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.
- (8) 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.
- (9) The following VRU parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:
 - a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg and the air purge solenoid must be open;
 - b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;
 - c. to ensure a proper flow rate from the absorption tower to the carbon bed, the absorber pressure shall be maintained between 8 psi and 15 psi; and
 - d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 150 degrees F.

Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the total, individual throughputs of refined petroleum product (distillates, Jet A, additives and interface (pipeline transmix)) from emissions unit J001, in gallons;
 - b. the rolling, 12-month summation of the total refined petroleum product throughput, in gallons (i.e., the monthly value from (a) added to the total product throughput for the previous 11-month period); and
 - c. the total emissions of VOC from this emissions unit, in tons.

- (2) The permittee shall implement a preventive maintenance program (PMP) for the VRU which has been approved by the Cleveland Division of Air Quality (CDAQ). The PMP shall include an annual inspection of the VRU by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the CDAQ.
 - (3) The permittee shall maintain the data required by the VRU manufacturer's recommended daily operating guidelines on a daily basis, excluding Saturdays, Sundays and holidays. The permittee shall submit a copy of the operating guidelines to the CDAQ within 90 days of the issuance of this permit. Any subsequent changes to these operating guidelines shall be mutually agreeable to the permittee and the CDAQ.
 - (4) The permittee shall collect and record the following information for each day (excluding Saturdays, Sundays and holidays) for the control equipment:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the petroleum product supply temperature in degrees F;
 - d. the absorber pressure in psi; and
 - e. the carbon bed temperatures in degrees F
 - (5) 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).
 - (6) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. Annual throughput of organic distillates shall not exceed 300,000,000 gallons per rolling 12-month period.
- 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) 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 Cleveland Division of Air Quality (CDAQ) 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.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section b)(1)a. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

0.167 pound of VOC per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel.

- Applicable Compliance Method:

Compliance shall be demonstrated through emission testing procedures identified in f)(2).

b. Emission Limitation:

Volatile organic compound emissions from gasoline loading shall not exceed 25.0 tons per year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined through compliance with the short term limitation and annual throughput limitation.

c. Emission Limitation:

Volatile organic compound emissions from gasoline loading (fugitive losses) shall not exceed 0.075 pound of VOC per 1,000 gallons (9 mg/l) of gasoline loaded into the delivery vessel.

Applicable Compliance Method:

The fugitive VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).

d. Emissions Limitation:

Annual VOC emissions from gasoline loading (fugitive losses) shall not exceed 11.3 tons of VOC per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined through compliance with the short term limitation and annual throughput limitation.

(2) 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 6 months prior to the permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 2A

Method 21

Method 25B

Method 205

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity between the calendar months of May and September, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ).
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).
 - f. Personnel from the CDAQ 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.
 - g. 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 CDAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CDAQ.
- (3) The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)
- g) Miscellaneous Requirements
- (1) This emissions unit consists of the following equipment:
 - a. 11 bottom loading arms in 3 bays for loading gasoline, additives and interface into the delivery vessels.
 - i. Bay number one has 2 gasoline and 2 interface bottom loading arms;
 - ii. Bay number two (middle bay) has 2 gasoline and 2 interface bottom loading arms; and
 - iii. Bay number three has 2 gasoline and 1 interface bottom loading arms.

- (2) To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section b)(1) the permittee shall employ the following:
- a. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" or equivalent program.
 - b. 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."
 - c. The fugitive VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - d. The VOC emissions from distillates, transmix, and/or other material loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

2. T010, TANK 23

Operations, Property and/or Equipment Description:

18,800 gallon fixed roof interface tank

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

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

a. None.

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

a. b)(1)b., c)(1), d)(2), e)(2) and f)(1).

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)(c) (PTI 13-02423)	See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and MACT applicability.	See b)(2)c. and c)(1)
c.	OAC rule 3745-21-09(L)(1)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall equip this emission with a submerged filling system and pressure/vacuum relief vent valves.

b. Pursuant to OAC rule 3745-21-09(L)(2)(a), this emission unit is exempt from the requirements specified in paragraph (L)(1) of OAC rule 3745-21-09.

- c. The total VOC emissions from emissions units T010 and T011 located at this facility shall not exceed 0.54 ton per year (combined) as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The annual throughput of interface (pipeline transmix) for emissions units T010 and T011 (combined) shall not exceed 100,800 gallons based upon a rolling, 12-month summation of the interface throughput amounts.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:
 - 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 liquid.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total throughput of interface, in gallons;
 - b. the rolling, 12-month summation of the total interface throughput, in gallons (i.e., the monthly value from (a) added to the total interface throughput for the previous 11-month period);
 - c. the total VOC emissions from emissions units T010 and T011, in tons; and
 - d. the rolling, 12-month summation of VOC emissions from emissions units T010 and T011, in tons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month summation of the total interface throughput, in gallons; and
 - ii. the rolling, 12-month emission limitation for VOC from emissions units T010 and T011.

- 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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(2)a. shall be determined in accordance with the following methods:

- a. Emission Limitations:

VOC emissions generated from working losses for emission units T010 and T011 shall not exceed 0.54 TPY combined.

- Applicable Compliance Method:

Compliance with the annual working loss VOC emission limitation for emission units T010 and T011 shall be determined by using the most recent version of USEPA's "Tanks" or equivalent program.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1991.

3. T011, TANK 24

Operations, Property and/or Equipment Description:

18,800 gallon fixed roof interface additive tank

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

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

a. None.

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

a. b)(1)b., c)(2), d)(2), e)(2) and f)(1).

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)(c) (PTI 13-02423)	See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT Applicability	See b)(2)c. and c)(2)
c.	OAC rule 3745-21-07(K)(4)	See c)(1)
d.	OAC rule 3745-21-09(L)(1)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall equip this emission with a submerged filling system and pressure/vacuum relief vent valves.

- b. Pursuant to OAC rule 3745-21-09(L)(2)(a), this emission unit is exempt from the requirements specified in paragraph (L)(1) of OAC rule 3745-21-09.
- c. The total VOC emissions from emissions units T010 and T011 located at this facility shall not exceed 0.54 ton combined per year as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than 1.5 pounds per square inch absolute, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09.
- (2) The annual throughput of interface (pipeline transmix) for emissions units T010 and T011 shall not exceed 100,800 gallons based upon a rolling, 12-month summation of the interface throughput amounts.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:
 - 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 liquid.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total throughput of interface, in gallons;
 - b. the rolling, 12-month summation of the total interface throughput, in gallons (i.e., the monthly value from (a) added to the total interface throughput for the previous 11-month period);
 - c. the total VOC emissions from emissions units T010 and T011, in tons; and
 - d. the rolling, 12-month summation of VOC emissions from emissions units T010 and T011, in tons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the

potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. the rolling, 12-month summation of the total interface throughput, in gallons; and
 - ii. the rolling, 12-month emission limitation for VOC from emissions units T010 and T011.
- 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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(2)c. shall be determined in accordance with the following methods:

- a. Emission Limitations:

VOC emissions generated from working losses for emission units T010 and T011 shall not exceed 0.54 TPY combined.

Applicable Compliance Method:

Compliance with the annual working loss VOC emission limitation for emission units T010 and T011 shall be determined by using the most recent version of USEPA's "Tanks" or equivalent program.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1991.

4. Emissions Unit Group -Six (6) ASTs equipped with IFRs: T001, T002, T003, T004, T005, T006,

EU ID	Operations, Property and/or Equipment Description
T001	407,400 gallon above ground storage tank with an internal floating roof
T002	1,289,400 gallon above ground storage tank with an internal floating roof
T003	1,243,200 gallon above ground storage tank with an internal floating roof
T004	1,268,400 gallon above ground storage tank with an internal floating roof
T005	1,058,400 gallon above ground storage tank with an internal floating roof
T006	1,079,400 gallon above ground storage tank with an 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)a., b)(2)a., b)(2)b., c)(1), d)(3), e)(2) and f)(1).

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(D)	See b)(2)a., b)(2)b., and c)(1).
b.	OAC rule 3745-21-09(L)	See c)(2)a. through d.

(2) Additional Terms and Conditions

a. The total combined VOC emissions generated from working losses for emission units T001 through T006 shall not exceed 23.91 tons per year as a rolling, 12-month summation.

- b. The total combined VOC emissions generated from roof landing losses for emission units T001 through T006 shall not exceed 13.16 tons per year as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The annual throughput of refined petroleum product for emissions units T001 through T006 shall not exceed 300,000,000 gallons based upon a rolling, 12-month summation of the product throughput amounts.
- (2) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The 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.
 - 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 for the fixed roof tank:
 - 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 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.
- (3) The permittee shall maintain monthly records of the following information:
 - a. The total throughput of refined petroleum product, in gallons;
 - b. The rolling, 12-month summation of the total product throughput, in gallons (i.e., the monthly value from (a) added to the total product throughput for the previous 11-month period); and
 - c. The total VOC emissions from units T001 through T006, in tons, and

- d. the rolling, 12-month summation of VOC emissions from emissions units T001 through T006, in tons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month summation of the total refined petroleum product throughput; and
 - ii. the rolling, 12-month summation of VOC emissions from emission units T001 through T006.
 - 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 notify the Cleveland Division of Air Quality (CDAQ) 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.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(2) shall be determined in accordance with the following methods:

a. Emission Limitations:

Combined VOC emissions generated from working losses for emission units T001 through T006 shall not exceed 23.91 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual working loss VOC emission limitation for emission units T001 through T006 shall be determined by using the most recent version of USEPA's "Tanks" or equivalent program.

b. Emission Limitations:

Combined VOC emissions generated from roof landing losses for emission units T001 through T006 shall not exceed 13.16 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual roof landing loss emission limitation for emission units T001 through T006 shall be determined by using the appropriate roof landing loss equations listed in AP-42, Section 7.1.3.2.2 7.1 Organic Liquid Storage Tanks - Roof Landings (2006) and the latest version of US EPA's TANKS software or equivalent program if necessary.

g) Miscellaneous Requirements

(1) None.