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

9/1/2011

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Greg Moore
Marathon Petroleum Company LP - Canton Terminal
539 South Main Street
Findlay, OH 45840

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576002007
Permit Number: P0108488
Permit Type: OAC Chapter 3745-31 Modification
County: Stark

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Canton City Health Department. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Canton; Pennsylvania; West Virginia

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Marathon Petroleum Company LP - Canton Terminal

Facility ID:	1576002007
Permit Number:	P0108488
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/1/2011
Effective:	9/1/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Marathon Petroleum Company LP - Canton Terminal

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Authorization

Facility ID: 1576002007
Facility Description: Gasoline and diesel loading rack terminal
Application Number(s): A0042054
Permit Number: P0108488
Permit Description: Ch.31 modification of TV PTI P0106130 to establish a facility-wide fugitive VOC emissions limit for the Canton Terminal, Transport & Rail (TT&R) incorporating fugitive components previously permitted at the Canton Refinery (1576002006).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $1,250.00
Issue Date: 9/1/2011
Effective Date: 9/1/2011

This document constitutes issuance to:

Marathon Petroleum Company LP - Canton Terminal
2419 Gambrinus Avenue SW
Canton, OH 44706

of a Permit-to-Install 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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108488
Permit Description: Ch.31 modification of TV PTI P0106130 to establish a facility-wide fugitive VOC emissions limit for the Canton Terminal, Transport & Rail (TT&R) incorporating fugitive components previously permitted at the Canton Refinery (1576002006).

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:	Gasoline/Kerosene/Diesel Loading Rack
Superseded Permit Number:	P0106130
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) [OAC rule 3745-15-03(A)]
   Unless other arrangements have been approved by the Director (the appropriate Ohio EPA District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

C. Emissions Unit Terms and Conditions

1. J001, Gasoline/Diesel/Ethanol Loading Rack

Operations, Property and/or Equipment Description:

Emissions unit J001 is a gasoline/diesel/ethanol loading rack that loads gasoline cargo tank trucks at a bulk gasoline terminal. The loading rack consists of 6 loading bays. Volatile organic compounds (VOC) emissions are controlled by a primary carbon adsorber/vapor recovery unit (VRU) and a backup thermal oxidizer/vapor burner system (VBS).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	10.0 lbs NO_X/hr 25.1 lbs CO/hr See b)(2)a. through b)(2)d.
b.	OAC rule 3745-31-05(D)	8.35 tons NO_X per rolling, 12-month period 20.9 tons CO per rolling, 12-month period 38.7 tons VOC per rolling, 12-month period See b)(2)b. through b)(2)d., c)(1) and c)(2)
c.	OAC rule 3745-31-05(F), Voluntary Restriction	VOC emissions from facility-wide fugitive equipment leaks shall not exceed 39.2 tons per year. See b)(2)e. through b)(2)f.
d.	OAC rule 3745-21-09(T)	See b)(2)g.
e.	OAC rule 3745-21-09(Q)	See b)(2)h. and c)(3)
f.	OAC rule 3745-17-11(B)(1)	Exempt. See b)(2)i.
g	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)j.
h.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	General Provisions. See b)(2)k.
i.	40 CFR Part 60, Subpart J (40 CFR 60.100-109) See b)(2)l.	The permittee shall not burn any fuel gas that contains H_2S in excess of 230 mg/dscm (0.10 gr/dscf). [40 CFR 60.104(a)(1)] See b)(2)m.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR Part 60, Subpart GGGa (40 CFR 63.590a-593a)	See b)(2)g and b)(2)n.
k.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart R of Part 63 lists the General Provisions applicability to Subpart R. See b)(2)k.
l.	40 CFR Part 63, Subpart R (40 CFR 63.420-429) See b)(2)o.	10.0 mg OC/liter gasoline loaded (0.084 lb OC/1000 gallons gasoline loaded) [40 CFR 63.422(b)] See b)(2)p., c)(4), c(5), and d)(10)
m.	40 CFR Part 63, Subpart CC (40 CFR 63.640-679)	Exempt. See b)(2)q.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements include compliance with the applicable sections of 40 CFR Part 60, Subpart J and 40 CFR Part 63, Subpart R as specified in the terms and conditions of this permit.

b. The permittee shall comply with the emissions limitations for nitrogen oxides (NO_X) and carbon monoxide (CO) only when using the backup thermal oxidizer/VBS as a means of controlling VOC emissions from this emissions unit.

c. The pounds per hour and tons per year NO_X and CO emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure ongoing compliance with these emissions limitations.

d. All of the VOC emissions from this emissions unit, except from fugitive components, shall be vented to a carbon adsorber or thermal oxidation system that shall meet the operational, monitoring, and recordkeeping requirements of this permit, when the emissions unit is in operation.

e. Installation of and modification to equipment included in this emissions unit shall not require a PTI pursuant to OAC rule 3745-31 solely as a result of increases in emissions from fugitive components unless and until the calculated facility-wide potential emissions from fugitive components equals or exceeds the facility-wide allowable emissions limit in b)(1)a.

f. The permittee shall consider only those fugitive component emissions from the emissions unit being installed (i.e., not facility-wide fugitive component emissions) when determining applicability under OAC 3745-31-11 through OAC 3745-31-20.

g. BAT for the control of fugitive VOC emissions from fugitive components shall be satisfied through implementation of and compliance with the permittee's approved Leak Detection and Repair (LDAR) Program.

The permittee's refinery-wide LDAR program, shall address the requirements of OAC rule 3745-21-09(T), 40 CFR Part 63, Subparts R, CC, and TT, and 40 CFR Part 60, Subparts GGG and GGGa.

h. The emissions limitation of 0.67 pound of VOC per thousand gallons (80 mg VOC/liter) of gasoline loaded specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 63, Subpart R.

i. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of this rule shall not apply, because the uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. In addition, pursuant to OAC rule 3745-17-11(A)(4), Table I of this rule shall not apply, because the process weight rate that causes any emissions of particulate matter is equal to zero.

j. Pursuant to OAC rule 3745-17-07(A)(3)(h), this emissions unit is exempt from the visible emission particulate emissions limitations specified in this rule, because the air contaminant source is not subject to any mass emissions limitation in OAC rule 3745-17-11.

k. The permittee shall develop and implement a written quality assurance/quality control plan for the continuous VOC monitoring system, designed to ensure continuous valid and representative readings of VOC emissions in units of the applicable standard(s). The program shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous VOC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct annual relative accuracy test audits in units of the standard(s), in accordance with and at the frequency required per 40 CFR Part 60.

l. In accordance with §60.104(a)(1), this emissions unit employs a backup fuel gas combustion control device, for which construction commenced after June 11, 1973 and before May 14, 2007, to process petroleum refinery products. Therefore, it is subject to the emissions limitations/control measures specified in this section.

m. The permittee may utilize the R.A. Nichols Engineering (RANE) portable equalizer/VBS, or equivalent, during periods of planned or unplanned carbon adsorber/VRU maintenance downtime in accordance with the Alternative Monitoring Plan approved by the US EPA on July 17, 2002. Pursuant to §63.421, the RANE unit is classified as thermal oxidation system, because it provides an enclosed flame to heat and oxidize air pollutants.

i. The permittee shall comply with all applicable emissions limitations and requirements specified in this permit during the operation of the thermal oxidizer/VBS control device. The thermal oxidizer/VBS shall be operated at all times when emissions are vented to it.

ii. The thermal oxidizer/VBS shall be used only as a temporary control measure for VOC emissions. The use of a thermal oxidizer/VBS to control VOC emissions from this emissions unit may be re-evaluated at any time based on information provided by Marathon Petroleum Company, LP (MPC) as specified in d) and e) of this permit, or as requested by the Director (the appropriate Ohio EPA District Office or local air agency).

iii. An alternative thermal oxidizer/VBS may be used provided the permittee has demonstrated compliance with the applicable requirements and emission limitations/control measures specified in b)(1) using the alternate thermal oxidizer/VBS under the same conditions as its intended use and in accordance with the testing requirements in f) of this permit.

iv. The permittee shall operate the thermal oxidizer/VBS in conformance with the design of the device and according to manufacturer recommendations and specifications.

n. The permittee shall comply with the requirements for applicable equipment leak provisions in 40 CFR Part 60, Subpart VVa (40 CFR 60.482-1a to 60.482-10a), except as specified in 40 CFR 60.593a.

o. In accordance with §63.421, this emissions unit is a controlled loading rack located at a gasoline facility which receives gasoline by pipeline and has a maximum calculated design throughput greater than 75,700 liters of gasoline per day. Therefore, it is subject to the emissions limitations/control measures specified in this section.

p. Pursuant to §63.422(a) and (c), the permittee shall comply with the following loading rack standards in 40 CFR Part 60, Subpart XX:

i. [40 CFR 60.502(a)]
The loading rack shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

ii. [40 CFR 60.502(d)]
Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

iii. [40 CFR 60.502(e)]
Loadings of liquid product into gasoline cargo tanks shall be limited to vapor-tight gasoline cargo tanks.

iv. [40 CFR 60.502(f)]
The permittee shall act to assure that loadings of gasoline tank trucks at the loading rack are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

v. [40 CFR 60.502(g)]
The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline cargo tank at the loading rack.

vi. [40 CFR 60.502(h)]
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.

vii. [40 CFR 60.502(i)]
No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

Pursuant to §63.422(e), as an alternative to §60.502(h) and (i), the permittee may comply with the following requirement: No pressure-vacuum vent in the bulk gasoline terminal's vapor processing system or vapor collection system may begin to open at a system pressure less than the applicable test limits in §63.425(e).

q. This emissions unit is exempt from the gasoline loading rack provisions specified in §63.650, because it is not classified under Standard Industrial Classification code 2911.

r. The terms and conditions for this emissions unit as specified in Permit to Install (PTI) P0108488 supersede all the terms and conditions specified in P0106130 dated March 16, 2011, and all previous modifications to, and including, the initial installation permit.

c) Operational Restrictions

(1) [OAC 3745-31-05(D)]
The maximum annual gasoline throughput rate for this emissions unit shall not exceed 920,000,000 gallons per year, based upon a rolling, 12-month summation of gasoline throughput.

a. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative gasoline throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Gallons of Gasoline Throughput
1	80,000,000
1-2	160,000,000
1-3	240,000,000
1-4	320,000,000
1-5	380,000,000

1-6	440,000,000
1-7	525,000,000
1-8	600,000,000
1-9	675,000,000
1-10	700,000,000
1-11	800,000,000
1-12	920,000,000

b. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the gasoline throughput.

(2) [OAC rule 3745-31-05(D)]
The maximum gasoline throughput rate for this emissions unit while a thermal oxidizer/VBS is being used to control VOC emissions shall not exceed 500,000,000 gallons per year, based upon a rolling, 12-month summation of gasoline throughput.

a. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative VBS gasoline throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Gallons of VBS Gasoline Throughput
1	80,000,000
1-2	160,000,000
1-3	240,000,000
1-4	320,000,000
1-5	380,000,000
1-6	440,000,000
1-7	500,000,000
1-8	500,000,000
1-9	500,000,000
1-10	500,000,000
1-11	500,000,000
1-12	500,000,000

b. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VBS gasoline throughput limitation shall be based upon a rolling, 12-month summation of the gasoline throughput while the thermal oxidizer/VBS is being used to control VOC emissions from this emissions unit.

(3) [OAC rule 3745-21-09(Q)]
The permittee shall comply with the bulk gasoline terminal requirements pursuant to OAC rule 3745-21-09(Q), including the following sections:

a. [OAC rule 3745-21-09(Q)(1)(b)(iii)]
The loading rack shall be equipped with a vapor control system whereby 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.

b. [OAC rule 3745-21-09(Q)(1)(c)]
A means is provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

c. [OAC rule 3745-21-09(Q)(1)(d)]
All gasoline loading lines and vapor lines are equipped with fittings which are vapor tight.

(4) [40 CFR 63.427(b)]
The permittee shall operate the vapor processing system in a manner not to exceed the operating parameter value for the parameter described in §63.427(a)(1), or to go below the operating parameter value for the parameter described in §63.427(a)(3), and established using the procedures in §63.425(b).

a. The permittee shall operate the carbon adsorption system/VRU in a manner not to exceed an exhaust organic compound (OC) concentration of 0.68 percent, by volume, as determined in accordance with the performance test conducted in August 2007 that demonstrated compliance with the allowable emission limit of 10 mg VOC/liter of gasoline loaded (0.084 lb VOC/1000 gallons gasoline loaded).

b. The permittee shall operate the thermal oxidation system/VBS in a manner not to go below the 6-hour average combustion temperature of 542 degrees Fahrenheit, as determined in accordance with the performance test conducted in October 2010 that demonstrated compliance with the allowable emission limit of 10 mg VOC/liter of gasoline loaded (0.084 lb VOC/1000 gallons gasoline loaded).

[OAC rule 3745-31-05(D)]
The operating parameter values are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Director (the appropriate Ohio EPA District Office or local air agency). The permittee may request revisions to the permitted operating parameter values based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating parameter values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(5) [40 CFR 63.424(g)]
The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: minimize gasoline spills; clean up spills as expeditiously as practicable; cover all open gasoline containers with a gasketed seal when not in use; and minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

d) Monitoring and/or Recordkeeping Requirements

(1) [OAC rule 3745-31-05(D)]
The permittee shall maintain monthly records of the following information:

a. Gasoline throughput for each calendar month;

b. Cumulative gasoline throughput for each calendar month during the first 12 months of operation following the issuance of this permit;

c. Rolling, 12-month summation of the gasoline throughput after the first 12 calendar months of operation following the issuance of this permit;

d. Cumulative gasoline throughput while the VBS is being used to control VOC emissions for each calendar month during the first 12 months of operation following the issuance of this permit;

e. Rolling, 12-month summation of the gasoline throughput while the VBS is being used to control VOC emissions after the first 12 calendar months of operation following the issuance of this permit; and

f. Total monthly VOC emissions calculated by multiplying the operating parameter value for the organic compound concentration in the exhaust gases from the carbon adsorber/VRU (0.68 percent) by the cumulative gasoline throughput for each calendar month.

(2) [40 CFR 63.427(a)]
The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) as specified below:

a. [40 CFR 63.427(a)(1)]
Where a carbon adsorption system/VRU is used to control VOC emissions, a continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream.

b. [40 CFR 63.427(a)(3)]
Where a thermal oxidation system/VBS other than a flare is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature must

be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.

(3) [40 CFR 63.428(c)(1)]
The permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under §63.427(a). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record.

[40 CFR 63.428(c)(2)]
The permittee shall record all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter values under §63.425(b).

(4) [40 CFR 60.13] and [40 CFR Part 60, Appendix B]
The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous VOC monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. The letter(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each CMS consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(5) [40 CFR 60.13] and [40 CFR Part 60, Appendices B & F]
The permittee shall operate and maintain equipment to continuously monitor and record VOC concentration of the exhaust gases from the carbon adsorption system/VRU in units of the applicable standard(s), using the detection principle of the reference method specified in the regulation(s) or this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

[40 CFR 63.10(c)]
The permittee shall maintain records of data obtained by the continuous VOC monitoring system for exhaust gases from the carbon adsorber/VRU including, but not limited to:

a. percent VOC, by volume, on an instantaneous basis in 6-hour averaging periods;

b. results of quarterly cylinder gas audits;

c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

d. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

e. date, time, and hours of operation of the emissions unit, continuous VOC monitoring system, and control equipment;

f. date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous VOC monitoring system;

g. date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous VOC monitoring system; as well as,

h. the reason (if known) and the corrective actions taken (if any) for each such event described in sections d)(5)f. and g. above.

(6) [OAC rule 3745-31-05(D)] and [40 CFR 63.8(c)]
The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer/VBS when the emissions unit is in operation, including periods of startup and shutdown. A minimum frequency of one cycle of operation (sampling, analyzing, and data recording) shall be completed for each successive 15-minute period. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ±1 percent of the temperature being measured or ±5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day the thermal oxidation system/VBS is required to demonstrate compliance with the VOC limitation contained in this permit:

a. all 6-hour blocks of time, when the emissions unit controlled by the thermal oxidizer/VBS was in operation, during which the average combustion temperature within the thermal oxidizer/VBS was below 542 degrees Fahrenheit; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer/VBS, monitoring equipment, and the associated emissions unit.

(7) [OAC rule 3745-31-05(D)]
Whenever a monitored operating parameter value deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the VOC concentration of the exhaust gases from the carbon adsorber/VRU or the thermal oxidizer/VBS combustion temperature readings, whichever is applicable, immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(8) [40 CFR 60.502(e)] and [40 CFR 63.422(c)]
The permittee shall limit loadings of liquid product into vapor-tight gasoline cargo tanks using the following procedures:

a. [40 CFR 60.502(e)(1)]
The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline cargo tank which is to be loaded at the loading rack.

i. [40 CFR 60.505(b)]
The documentation file for each gasoline tank truck shall be updated at least once per year to reflect the current test results as determined by Method 27. The minimum documentation requirements of §60.505(b) are less stringent than those specified in §63.428(b) listed under d)(9) below.

b. [40 CFR 60.502(e)(2)]
The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded at the loading rack.

c. [40 CFR 60.502(e)(3)(i)]
The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) 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:

i. [40 CFR 60.502(e)(3)(i)(A)]
If less than an average of one gasoline cargo tank per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

ii. [40 CFR 60.502(e)(3)(i)(B)]
If less than an average of one gasoline cargo tank per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

[40 CFR 60.502(e)(3)(ii)]
If either the quarterly or semiannual cross-check provided in §60.502(e)(3)(i)(A) or (B) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

d. [40 CFR 60.502(e)(4)]
The permittee shall notify the owner or operator of each non-vapor-tight gasoline cargo tank loaded at the loading rack within 1 week of the documentation cross-check in §60.502(e)(3).

e. [40 CFR 60.502(e)(5)] and [40 CFR 63.422(c)(2)]
The permittee shall take steps assuring that the non-vapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that:

i. The tank truck meets the test requirements in §63.425(e); and

ii. For each gasoline cargo tank failing the test in §63.425(f) or (g) at the facility, the cargo tank either:

(a) Before repair work is performed on the cargo tank, meets the test requirements in §63.425(g) or (h); or

(b) After repair work is performed on the cargo tank before or during the tests in §63.425(g) or (h), subsequently passes the annual certification test described in §63.425(e).

f. [40 CFR 60.502(e)(6)]
Alternate procedures to those described in §60.502(e)(1) through (5) for limiting gasoline cargo tank loadings may be used upon application to, and approval by, the Director (the appropriate Ohio EPA District Office or local air agency).

(9) [40 CFR 63.428(b)]
The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as follows:

a. [40 CFR 63.428(b)(1)]
Annual certification testing performed under §63.425(e);

b. [40 CFR 63.428(b)(2)]
Continuous performance testing performed at any time at that facility under §63.425 (f), (g), and (h); and

c. [40 CFR 63.428(b)(3)]
The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:

i. Name of test: Annual Certification Test – Method 27 (§63.425(e)(1)); Annual Certification Test – Internal Vapor Valve (§63.425(e)(2)); Leak Detection Test (§63.425(f)); Nitrogen Pressure Decay Field Test (§63.425(g)); or Continuous Performance Pressure Decay Test (§63.425(h));

ii. Cargo tank owner's name and address;

iii. Cargo tank identification number;

iv. Test location and date;

v. Tester name and signature;

vi. Witnessing inspector, if any: name, signature, and affiliation;

vii. Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing; and

viii. Test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.

d. [40 CFR 63.428(k)]
As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.428(b), the permittee may comply with either of the following requirements specified in §63.428(k)(1) or (2):

i. [40 CFR 63.428(k)(1)]
An electronic copy of each record is instantly available at the terminal.

(a) The copy of each record in §63.428(k)(1) is an exact duplicate image of the original paper record with certifying signatures.

(b) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §63.428(k)(1).

ii. [40 CFR 63428(k)(2)]
For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by

permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.

(a) The copy of each record in §63.428(k)(2) is an exact duplicate image of the original paper record with certifying signatures.

(b) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §63.428(k)(2).

(10) [40 CFR 63.424]
The permittee shall comply with the applicable equipment leak standards pursuant to 40 CFR Part 63, Subpart R, including the following sections:

a. [40 CFR 63.424(a)]
The permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of a gasoline cargo tank.

b. [40 CFR 63.424(b)]
A log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.

c. [40 CFR 63.424(c)]
Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in §63.424(d).

d. [40 CFR 63.424(d)]
Delay of repair of leaking equipment will be allowed upon a demonstration to the Director (the appropriate Ohio EPA District Office or local air agency) that repair within 15 days is not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed.

e. [40 CFR 63.424(f)]
As an alternative to compliance with the provisions in §63.424(a) through (d), the permittee may implement an instrument leak monitoring program that has been demonstrated to the Director (the appropriate Ohio EPA District Office or local air agency) as at least equivalent. The operational restrictions, monitoring, recordkeeping, and reporting requirements established in the MPC, Ohio Refining Division's, Canton Refinery Leak Detection and Repair (LDAR) Program satisfy the equipment leak standards under §63.424.

(11) [40 CFR 63.428(e)]
The permittee shall record the following information in the log book for each leak that is detected:

a. Equipment type and identification number;

b. Nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);

c. Date the leak was detected and the date of each attempt to repair the leak;

d. Repair methods applied in each attempt to repair the leak;

e. ”Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;

f. Expected date of successful repair of the leak if the leak is not repaired within 15 days; and

g. Date of successful repair of the leak.

(12) [40 CFR 60.105]
The permittee shall conduct monitoring as specified in §60.105(a)(3) and (4) unless compliance with the H_2S emissions limitation has been demonstrated using the Alternative Monitoring Plan as described in g)(1) of this permit.

(13) [40 CFR 63.10(b)(1)]
All records required by this permit shall be stored in a readily accessible location for at least five years and shall be available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

(14) [40 CFR 60.592a]

a. The permittee shall comply with the requirements of §§60.482-1a to 60.482-10a as soon as practicable, but no later than 180 days after initial startup.

b. The permittee may elect to comply with the requirements §60.483-1a, §60.483-2a or Phase III provisions in §63.168. The permittee may elect to follow the provisions in §60.482-7a(f) instead of §63.168 for any valve that is designated as being leakless.

c. The permittee may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in this subpart. In doing so, the permittee shall comply with the requirements of §60.484a.

d. The permittee shall comply with the provisions of §60.485a except as provided in §60.593a.

e. The permittee shall comply with the provisions of §§60.486a and 60.487a.

e) Reporting Requirements

(1) [OAC rule 3745-31-05(D)]
The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency), in writing, when the backup thermal oxidizer/VBS will be used to control emissions from this emissions unit 30 days prior to planned usage and within 14 days following an unplanned usage of the thermal oxidizer/VBS. This notification shall include the following information:

a. Dates and times of startup of the thermal oxidizer/VBS;

b. Reason(s) for using the thermal oxidizer/VBS;

c. Approximate length of time the thermal oxidizer/VBS will be used;

d. If there will be a change in the type of emissions controlled by the thermal oxidizer/VBS; and

e. If the thermal oxidizer/VBS is not the RANE portable equalizer specified in b)(2)j. of this permit, why an alternative system is being used and the most recent stack test report for this equivalent thermal oxidizer/VBS.

(2) [40 CFR 63.10(e)(3)(v) and (vi)]
The permittee shall submit a quarterly excess emissions and continuous monitoring system performance report and/or a summary report to Director (the appropriate Ohio EPA District Office or local air agency), within 30 days following the end of each calendar quarter, documenting all instances of VOC emissions in excess of any applicable limit specified in this permit.

Each written excess emissions report shall address the operations conducted and data obtained during the previous calendar quarter and include all the information required in §63.10(c)(5) through (13), in §63.8(c)(7) and (8), and in §63.428(h). When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

As required under §63.10(e)(3)(vii) and (viii), one summary report shall be submitted for the hazardous air pollutants monitored at each affected source. The summary report shall be entitled “Summary Report—Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance” and shall contain the following information:

a. The company name and address;

b. An identification of each hazardous air pollutant monitored;

c. The beginning and ending dates of the reporting period;

d. A brief description of the process units;

e. The emission and operating parameter limitations;

f. The monitoring equipment manufacturer(s) and model number(s);

g. The date of the latest CMS certification or audit;

h. The total operating time during the reporting period;

i. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;

j. A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;

k. A description of any changes in CMS, processes, or controls since the last reporting period;

l. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. The date of the report.

If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Director (the appropriate Ohio EPA District Office or local air agency).

If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

(3) [40 CFR 63.428(h)]
The permittee shall submit an excess emissions report to the Director (the appropriate Ohio EPA District Office or local air agency) in accordance with §63.10(e)(3), whether or not a CMS is installed at the facility. The following occurrences are excess emissions events under this subpart, and the following information shall be included in the excess emissions report, as applicable:

a. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter values determined under §63.425(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

b. Each instance of a nonvapor-tight gasoline cargo tank loading at the facility in which the permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.

c. Each reloading of a nonvapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with §63.422(c)(2).

d. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection:

i. Date on which the leak was detected;

ii. Date of each attempt to repair the leak;

iii. Reasons for the delay of repair; and

iv. Date of successful repair.

(4) [40 CFR 63.428(g)]
The permittee shall submit a semiannual report to the Director (the appropriate Ohio EPA District Office or local air agency), including the following information:

a. Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility; and

b. Number of equipment leaks not repaired within 5 days after detection.

(5) [OAC rule 3745-15-03(C)]
The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) by January 30, April 30, July 30, and October 30 of each year. These deviation reports shall address the data obtained during the previous calendar quarter and shall identify the following:

a. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to a carbon adsorption or thermal oxidation system;

b. each incident of deviation described in e)(3)a. and e)(5)a. above, where a prompt investigation was not conducted;

c. each incident of deviation described in e)(3)a. and e)(5)a. above, where prompt corrective action, that would bring the emissions unit into compliance and/or the operating parameter values into compliance with the acceptable limits, was determined to be necessary and was not taken;

d. each incident of deviation described in e)(3)a. and e)(5)a. above, where proper records were not maintained for the investigation and/or the corrective action(s);

e. any change in the description, types, identification numbers, and locations of the equipment in gasoline service at the facility;

f. any exceedance of the 920,000,000 gallon, rolling, 12-month summation of gasoline throughput allowance, and/or 500,000,000 gallon, rolling, 12-month summation of gasoline throughput allowance while using a thermal oxidizer/VBS to control VOC emissions, for this emissions unit;

g. each instance of emissions in excess of any applicable limit specified in b)(1) of this permit, including:

i. Date that the exceedance occurred;

ii. Explanation of the exceedance;

iii. Duration of the exceedance;

iv. Whether the exceedance was concurrent with a startup, shutdown, or malfunction of an affected facility or control system; and

v. A description of the corrective action taken, if any, and the root cause analysis, if applicable.

(6) [40 CFR 60.592a]
The permittee shall submit semiannual reports to the Director (the appropriate Ohio EPA District Office or local air agency) in accordance with §60.487a, beginning 6 months after the initial start-up date.

a. The initial semiannual report shall in include the following information:

i. Process unit identification;

ii. Number of valves subject to the requirements of §60.482-7a, excluding those valves designated for no detectable emissions under the provisions of §60.482-7a(f);

iii. Number of pumps subject to the requirements of §60.482-2a, excluding those compressors designated for no detectable emissions under the provisions of §60.482-2a(e) and those pumps complying with §60.482a(f);

iv. Number of compressors subject to the requirements of §60.482-3a, excluding those compressors designated for no detectable emissions under the provisions of §60.482-3a(i) and those compressors complying with §60.482-3a(h);

v. The number of connectors subject to the requirements of §60.482-11a.

b. All semiannual reports to the Director (the appropriate Ohio EPA District Office or local agency) shall include the following information, summarized from the information in §60.486a:

i. Process init identification

ii. For each month during the semiannual reporting period,

(a) Number of valves for which leaks were detected as described in §60.482-7a(b) or §60.483-2a,

(b) Number of valves for which leaks were not repaired as required in §60.482-7a(d)(1),

(c) Number of pumps for which leaks were detected as described in §60.482-2a(b), (d)(4)(ii)(A) or (B) or (d)(5)(iii),

(d) Number of pumps for which leaks were not repaired as required in §60.482-2a(c)(1) and (d)(6),

(e) Number of compressors for which leaks were detected as describes in §60.482-3a(f),

(f) Number of compressors for which leaks were not repaired as required in §60.482-3a(g)(1),

(g) Number of connectors for which leaks were detected as described in §60.482-11a(b),

(h) Number of connectors for which leaks were not repaired as required in §60.482-11a(d), and

(i) The facts that explain each delay of repair, and where appropriate, why a process unit shutdown was technically infeasible.

iii. Dates of process unit shutdowns which occurred within the semiannual reporting period

iv. Revision items reported according to paragraph (b) of this section if changes have occurred since the initial report or subsequent revisions to the initial report.

v. The permittee electing to comply with the provisions of §60.483-1a or 60.483-2a shall notify the Director (the appropriate Ohio EPA District Office or local agency) of the alternative standard selected 90 days before implementing with of the provisions.

vi. The permittee shall report the results of all performance tests in accordance with §60.8 of the General Provisions. The provisions of §60.8(d) do not apply to affected facilities subject to the provisions of this subpart except that the permittee must notify the Director (the appropriate Ohio EPA District Office or local agency) of the schedule for the initial performance tests at least 30 days before the initial performance tests.

vii. The requirements of paragraphs (a) through (c) of this section remain in force until and unless EPA, in delegating enforcement authority to a state under section 111(c) of the Clean Air Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such state. In that event, affected sources within the state will be relieved of the obligation to comply with the requirements of paragraphs (a) through (c) of this section, provided that they comply with the requirements established by the state.

f) Testing Requirements

(1) Compliance with the emissions limitations and control measures in b)(1) of this permit shall be determined in accordance with the following methods:

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

10.0 lbs NO_X/hr

25.1 lbs CO/hr

<u>Applicable Compliance Methods</u>:

Compliance with the above NO_X limit shall be demonstrated by multiplying 300,000 gallons, the maximum hourly gasoline throughput for J001, by 0.0334 lb NO_X/1000 gallon of gasoline loaded.*

Compliance with the above CO limit shall be demonstrated by multiplying 300,000 gallons, the maximum hourly gasoline throughput for J001, by 0.0835 lb CO/1000 gallon of gasoline loaded.*

*The emission factors of 0.0334 lb NO_X/1000 gallons of gasoline and 0.0835 lb CO/1000 gallons of gasoline were provided by the manufacturer of the RANE portable equalizer/VBS unit.

If required, the permittee shall demonstrate compliance with the above NO_X and CO limits in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 7 and 10, respectively.

b. Emissions Limitations:

8.35 tons NO_X per rolling, 12-month period

20.9 tons CO per rolling, 12-month period

Applicable Compliance Methods:

Compliance with the above NO_X limit shall be demonstrated by multiplying 500,000,000 gallons, the maximum permitted gasoline throughput for J001 while the using a thermal oxidizer/VBS to control VOC emissions, by 0.0334 lb NO_X/1000 gallon of gasoline loaded* and dividing by 2000.

Compliance with the above CO limit shall be demonstrated by multiplying 500,000,000 gallons, the maximum permitted gasoline throughput for J001 while the using a thermal oxidizer/VBS to control VOC emissions, by 0.0835 lb CO/1000 gallon of gasoline loaded* and dividing by 2000.

*The emission factors of 0.0334 lb NO_X/1000 gallons of gasoline and 0.0835 lb CO/1000 gallons of gasoline were provided by the manufacturer of the RANE portable equalizer/VBS unit.

c. Emissions Limitation:

38.7 tons VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the above VOC limit shall be demonstrated based upon the monitoring and record keeping requirements in d) of this permit.

d. Emission Limitation:

230 mg H_2S/dscm (0.10 gr H_2S/dscf)

Applicable Compliance Method:

Compliance with the above H_2S limit shall be demonstrated using the alternative monitoring strategy as described in g)(1) of this permit any time there is a change in the type or sulfur content of the product being transferred through this emissions unit while the thermal oxidizer/VBS is used to control emissions.

If the permittee has not demonstrated compliance with the above H_2S limit using the Alternative Monitoring Plan, compliance shall be demonstrated in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 11 pursuant to §60.106(e)(1).

e. Emissions Limitation:

10.0 mg OC/liter gasoline loaded (0.084 lb OC/1000 gallons gasoline loaded)

Applicable Compliance Method:

Compliance with the above OC limit shall be demonstrated based upon the monitoring and record keeping requirements in d) of this permit.

The permittee shall also demonstrate compliance with the above OC limit in accordance with the procedures specified in f)(2) of this permit and 40 CFR Part 60.503 pursuant to §63.425(a)(1)(i), or shall use the alternative test methods and procedures in §63.7(f), pursuant to §63.425(a)(1)(ii).

f. Emissions Limitation:

VOC emissions from terminal-wide fugitive equipment leaks shall not exceed 39.2 tons per year.

Applicable Compliance Method:

The potential terminal-wide fugitive emissions shall be calculated using the following methodology:

The potential terminal-wide fugitive emissions are based upon the sum of potential fugitive emissions from components in each emissions unit at the terminal. These components include all valves, pumps, pressure relief valves, connectors, open ended lines, and sampling connections in regulated service at the facility. Potential fugitive emissions are calculated using the terminal component count, component service type, and PTE fugitive emission factors. The potential fugitive emissions can be calculated by multiplying all the components in a given service type by the respective PTE fugitive emission factor as listed in the table below. The summation of emissions from all components in each service type is the terminal-wide potential fugitive emissions.

Component Type	Chemical State	PTE Emission Factor (lb/hr)
Use for MONITORED or UNMONITORED COMPONENTS [a]		
Compressor	GV	1.56
Connector	HL	0.000612
Connector	LL	0.000612
Pressure Relief Device (vented to atmosphere)	LL	0.00563
Pressure Relief Device (vented to atmosphere)	GV	0.392
Use for MONITORED COMPONENTS [a]		
Connector	GV	0.00023
Valve	GV	0.00318
Valve	LL	0.00299
Valve	HL	0.000563
Potential Open-Ended Line	GV	0.00098
Potential Open-Ended Line	LL	0.000922
Pump	HL	0.0426
Pump	LL	0.0647
Use for UNMONITORED COMPONENTS [a]		
Connector	GV	0.000612
Valve	GV	0.06565
Valve	LL	0.0267
Valve	HL	0.000563
Potential Open-Ended Line	GV	0.00563
Potential Open-Ended Line	LL	0.00563
Pump	HL	0.0514
Pump	LL	0.279

[a]The emission factor presented for "monitored components" in this table reference components at the Canton Terminal that will be included in the Canton Refinery's LDAR Plan and for which some form of periodic monitoring (i.e., quarterly, semiannual, annual, ect.) will be required by the LDAR Plan. "Unmonitored components" are those components that do not meet the definition of "monitored components."

g. Control Measure:

The vapor collection and liquid loading equipment shall be designed and operated to prevent the gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during loading.

Applicable Compliance Method:

The permittee shall demonstrate compliance by performing the test procedures in accordance with §60.503(b) and (d), including the specifications pursuant to §63.425(a)(1)(i):

Immediately before the performance test required to determine compliance with the above delivery tank gauge pressure limit, the permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline cargo tank is being loaded. The permittee shall repair all leaks with readings of 500 ppm (as methane) or greater before conducting the performance test.

A pressure measurement device 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 cargo tank. 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 in gasoline service must be tested at least once during the performance test.

h. Control Measure:

The permittee may utilize an R.A. Nichols portable equalizer/VBS, or equivalent, during planned VRU maintenance or emergency downtime as specified in b)(2)j. of this permit.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by conducting a performance test for VOC emissions in accordance with the methods and procedures specified in f)(2) below.

(2) [40 CFR 63.425(a)]
Within six months following the issue date of this permit, and in accordance with the schedule of testing established in the company's Title V operating permit, the permittee shall conduct a performance test between the months of May through August on the primary carbon adsorber/VRU to determine continuing compliance with the allowable VOC emissions rate and reestablish the operating parameter value for this emissions unit in accordance with the test methods and procedures specified in §60.503.

a. [40 CFR 60.503(a)]
The permittee shall use as reference methods and procedures the test methods in Appendix A of 40 CFR Part 60 or other methods and procedures as specified in §60.503(c), except as provided in §60.8(b). The three run requirement in §60.8(f) does not apply to this emissions unit.

b. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Director (the appropriate Ohio EPA District Office or local air agency). The 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 name(s) of person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test may result in the Director's (the appropriate Ohio EPA District Office or local air agency) refusal to accept the results of the test.

c. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, 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 performance of the control equipment.

d. A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following completion of the test.

(3) [40 CFR Part 63.425(b)]
For each performance test conducted, the permittee shall determine a monitored operating parameter value for the vapor processing system using the following procedure:

a. During the performance test, continuously record the applicable operating parameter(s) under §63.427(a);

b. Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations; and

c. Provide, for the Director's (the appropriate Ohio EPA District Office or local air agency) approval, the rationale for the selected operating parameter value, and monitoring frequency and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.422(b).

(4) [40 CFR 63.425(c)]
For performance tests performed after the initial test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test.

(5) [40 CFR 63.425(e)]
The annual certification test for gasoline cargo tanks shall consist of 40 CFR Part, Appendix A, Method 27 and the testing procedures specified in §63.425(e)(1), including a pressure test of the cargo tank's internal vapor valve conducted in accordance with the test methods and procedures specified under §63.425(e)(2).

(6) [40 CFR 63.425(f)]
The leak detection test shall be performed using 40 CFR Part 60, Appendix A, Method 21 and the test procedures specified under §63.425(f)(1) and (2).

(7) [40 CFR 63.425(g)]
For those cargo tanks with manifolded product lines, the nitrogen pressure decay field test shall be conducted in accordance with the test methods and procedures specified under §63.425(g)(1) through (5).

(8) [40 CFR 63.425(h)]
The continuous performance pressure decay test shall be performed using 40 CFR Part 60, Appendix A, Method 27 and the test procedures specified under §63.425(h).

g) Miscellaneous Requirements

(1) In a letter dated June 24, 2002, from Marathon Ashland Petroleum LLC, Ohio Refining Division, Canton Ohio (MPC) to Mr. Charles Hall, USEPA Region V, Chicago, Ill., MPC requested approval of an Alternative Monitoring Plan for Combusted VOC vapors in a Portable Combustor during gasoline transfer at MPC's Loading Rack (emissions unit J001). The plan was necessary in order to exempt MPC from conducting monitoring pursuant to 40 CFR Part 60.105 (Subpart J) since the off gas from this emissions unit is defined as a refinery fuel gas pursuant to 40 CFR Part 60.101. The alternative monitoring plan was included in this letter. On July 17, 2002, in a letter from Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, US EPA Region V, US EPA approved MPC's alternative monitoring plan. The alternative monitoring plan is as follows:

a. Representative air samples are to be collected at the inlet to the VBS or VRU;

b. Air samples shall be analyzed for hydrogen sulfide concentration. The samples are analyzed using a sensodyne air analyzer with a hydrogen sulfide detector tube;

c. Two weeks of sampling are conducted; and

d. Test results are submitted for approval.

The alternative monitoring plan includes conducting the monitoring in accordance with the Alternative Monitoring Plan for NSPS Subpart J Refinery Fuel Gas Document entitled "Conditions for Approval of an Alternative Monitoring Plan for Miscellaneous Refinery Fuel Streams", US EPA Sector Notebook, 1995.