



Environmental Protection Agency

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

Certified Mail

9/8/2011

Dayu Zhang
Sunoco Partners Marketing & Terminals LP
P.O.Box 1014
Toledo, OH 43697

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

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

Facility ID: 1677010377
Permit Number: P0108238
Permit Type: Renewal
County: Summit

Dear Permit Holder:

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

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

and Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
ARAQMD; Pennsylvania; West Virginia; Canada



Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

2. Source Description: Sunoco Partners Marketing & Terminals L.P. - Akron, in Summit County, consists for a loading rack (J001), seven permitted storage tanks (T001, T003 (includes two storage tanks), T008, T009, T010, and T011,), two exempt natural gas-fired furnaces, one exempt additive storage tank, and two exempt diesel additive storage tanks. The facility receives fuels from a pipeline, stores the fuels in bulk storage tanks, and delivers the product to tank trucks via a loading rack. The facility handles a variety of fuels, including various grades of gasoline, distillate fuel oil, kerosene, and transmix.

3. Facility Emissions and Attainment Status: Sunoco's facility potential to emit for volatile organic compounds (VOC), an individual hazardous air pollutant (HAP) and combined HAPs without any throughput limitations would be 736.2, 12.3, and 26.6 tons per year, respectively. Summit County is attainment for ozone.

4. Source Emissions: Sunoco has proposed to continue to restrict their gasoline (i.e., gasoline, gasoline additive, transmix, and ethanol), and distillates (i.e., kerosene and diesel fuel) throughputs to 233,500,000 gallons and 225,000,000 per year as a rolling 12-month, summation of the monthly throughputs, respectively, for the loading rack (J001). These throughput restrictions will limit Sunoco's VOC emissions, any individual HAP, and combined HAPs to under 99.9 tons per year, 9.9 tons per year, and 24.9 tons per year, respectively, for the entire facility

5. Conclusion: With the throughput limitations on gasoline and distillates for the loading rack (J001), Sunoco's potential to emit for VOC, any individual HAP, and combined HAPs will be below Title V thresholds. To ensure compliance, Sunoco will maintain monthly records of the throughput for each product type.

6. Please provide additional notes or comments as necessary:

None

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

Table with 2 columns: Pollutant, Tons Per Year. Rows include VOC (99.9), Individual HAP (9.9), and Combined HAPs (24.9).

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Sunoco Partners Marketing & Terminals LP

Issue Date: 9/8/2011
Permit Number: P0108238
Permit Type: Renewal
Permit Description: Renewal of the Federally Enforceable Permit to Install and Operate for five internal floating roof storage tanks (T001, T008, T009, T010, and T011) and two fixed roof storage tanks (T003).
Facility ID: 1677010377
Facility Location: Sunoco Partners Marketing & Terminals LP
999 Home Ave,
Akron, OH 44310
Facility Description: Petroleum Bulk Stations and Terminals

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Laura Miracle at Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Sunoco Partners Marketing & Terminals LP**

Facility ID:	1677010377
Permit Number:	P0108238
Permit Type:	Renewal
Issued:	9/8/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Sunoco Partners Marketing & Terminals LP

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Authorization

Facility ID: 1677010377
Application Number(s): A0041956, A0042052
Permit Number: P0108238
Permit Description: Renewal of the Federally Enforceable Permit to Install and Operate for five internal floating roof storage tanks (T001, T008, T009, T010, and T011) and two fixed roof storage tanks (T003).
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/8/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Sunoco Partners Marketing & Terminals LP
999 Home Ave
Akron, OH 44310

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0108238
Permit Description: Renewal of the Federally Enforceable Permit to Install and Operate for five internal floating roof storage tanks (T001, T008, T009, T010, and T011) and two fixed roof storage tanks (T003).

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

Emissions Unit ID: T003
Company Equipment ID: Tanks #12 and #13
Superseded Permit Number: P0102696
General Permit Category and Type: Not Applicable

Emissions Unit ID: T008
Company Equipment ID: Tank #16
Superseded Permit Number: P0102696
General Permit Category and Type: Not Applicable

Emissions Unit ID: T009
Company Equipment ID: Tank #10
Superseded Permit Number: P0102696
General Permit Category and Type: Not Applicable

Group Name: Group 1

Table with 3 columns: Emissions Unit ID, Company Equipment ID, Superseded Permit Number, General Permit Category and Type. Rows include units T001, T010, and T011.

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 Akron Regional Air Quality Management District 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.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2, 3, 4, 5, and 6.
2. The combined annual emissions from all facility emissions units, including permit to install exempt and "de minimis" emissions units, shall not exceed the following as rolling, 12-month summations:
 - a) 99.9 tons of VOC per year;
 - b) 24.9 tons of combined hazardous air pollutants (HAPs) per year; and
 - c) 9.9 tons of any individual HAP per year.
3. Compliance with the above-mentioned emission limitations shall be achieved by restricting gasoline (i.e., gasoline, ethanol, gasoline additive, and transmix) and distillates (i.e., kerosene and diesel fuel) throughputs for the truck loading rack (J001). The maximum annual throughputs of gasoline and distillates shall not exceed 233,500,000 gallons and 225,000,000 gallons, respectively, based upon a rolling, 12-month summation of the monthly throughput rates.
4. The permittee shall maintain monthly records of the following information:
 - a) For emissions unit J001:
 - (1) the total, individual throughputs of gasoline and distillates, in gallons; and
 - (2) the rolling, 12-month summations of the total individual throughputs of gasoline and distillates, in gallons.
 - b) For emissions units T001, T003, T008, T009, T010, and T011:
 - (1) the identification of each material stored; and
 - (2) the total throughput of each material stored, in gallons per month.
5. 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:

- (1) the rolling, 12-month gasoline throughput restriction; and
- (2) the rolling, 12-month distillates throughput restriction;
- 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).

6. Compliance with the emissions limitations specified in 2 above shall be determined in accordance with the following methods:

a) Emission Limitation:

99.9 tons of VOC per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the records required pursuant to 4 above, and shall be determined as follows:

- (1) Storage Tanks* -The VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.
- (2) Fugitive –The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using the emission factors from Table 2-3 in EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" document.
- (3) Gasoline and Transmix Truck Loading –The VOC emissions from gasoline and transmix truck loading shall be determined from the most recent VOC stack test results for the outlet of the control equipment, in mg of VOC/liter of gasoline loaded.
- (4) Gasoline and Transmix Truck Loading (vapor tightness loss)–The VOC emissions from vapor tightness loss shall be determined using the VOC emission factor of 9.0 mg of VOC/liter of gasoline loaded. The 9.0 mg of VOC/liter of gasoline loaded 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 and letter dated April 13, 1995 to Karin Ritter of the American Petroleum Institute from Radian Corporation).

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- (5) Distillate Loading –The VOC emissions from distillate loading shall be determined using emission factors in AP-42, Fifth Edition, Table 5.2-5, dated January 1995.
- (6) Permit Exempt and De Minimis Emissions Units –The VOC emissions from permit exempt (OAC rule 3745-31-03) and "de minimis" (OAC rule 3745-15-05) emissions units shall be determined using approved methods (i.e., for boilers AP-42 Chapter 1.4 and for storage tanks the most current version of USEPA's "Tanks" program).
- (7) Total VOC emissions –the sum of 6.a)(1) + 6.a)(2) + 6.a)(3) + 6.a)(4) + 6.a)(5) + 6.a)(6), and then dividing by 2000 pounds per ton.

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, Akron Regional Air Quality Management District, and the permittee.

b) Emission Limitations:

24.9 tons of combined HAPs per year as a rolling, 12-month summation

9.9 tons of any individual HAP per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the records required pursuant to 4 above, and shall be determined as follows:

- (1) Gasoline and Transmix Truck Loading - The individual HAP emissions from gasoline and transmix truck loading shall be determined using emission factors derived from the emission factor calculations outlined in Section 5 of API Publication 347, October 1988. The emission factor shall be as follows:
 - a. benzene - 1.2E-07 pound of benzene emissions per gallon of gasoline loaded;
 - b. toluene - 1.7E-06 pound of toluene emissions per gallon of gasoline loaded;
 - c. xylene - 9.2E-06 pound of xylene emissions per gallon of gasoline loaded;
 - d. ethylbenzene - 1.4E-06 pound of ethylbenzene emissions per gallon of gasoline loaded;
 - e. isooctane - 1.9E-06 pound of isooctane emissions per gallon of gasoline loaded;
and
 - f. hexane - 4.9E-07 pound of hexane emissions per gallon of gasoline loaded.

These emission factors are based on an uncontrolled emission factor of 980 mg/l from AP-42 Table 5.2-5, dated 1/95, the average control efficiency's of HAP from Table 4-3 of API Publication 347, and liquid weight percents as listed in 6.b)(5) below.

- (2) Distillate Truck Loading (diesel and heating oil) - The individual HAP emissions from distillate truck loading associated with diesel and heating oil shall be calculated by taking

the product of the total VOC emission rate for distillate truck loading associated with diesel and heating oil and the vapor weight percents as follows:

- a. benzene - 0.1884 pound of benzene per pound of VOC emissions;
- b. cumene - 0.0084 pound of cumene per pound of VOC emissions;
- c. toluene - 0.1184 pound of toluene per pound of VOC emissions;
- d. xylene - 0.1139 pound of xylene per pound of VOC emissions;
- e. ethylbenzene - 0.0238 pound of ethylbenzene per pound of VOC emissions; and
- f. hexane - 0.0572 pound of hexane per pound of VOC emissions.

The vapor weight percents were determined using equations 4-3, 4-4, 4-5, and 4-6 from AP-42 section 7.1.4, dated 9/97, and the liquid weight percents taken from Table 3-1 of API Publication 1673.

- (3) Distillate Truck Loading (kerosene and jet fuel) - The individual HAP emissions from distillate truck loading associated with kerosene and jet fuel shall be calculated by taking the product of the total VOC emission rate for distillate truck loading associated with kerosene and jet fuel and the vapor weight percents as follows:

- a. benzene - 0.0574 pound of benzene per pound of VOC emissions;
- b. cumene - 0.0038 pound of cumene per pound of VOC emissions;
- c. naphthalene - 0.0087 pound of naphthalene per pound of VOC emissions;
- d. toluene - 0.0772 pound of toluene per pound of VOC emissions;
- e. xylene - 0.1115 pound of xylene per pound of VOC emissions;
- f. ethylbenzene - 0.02075 pound of ethylbenzene per pound of VOC emissions;
and
- g. hexane - 0.1462 pound of hexane per pound of VOC emissions.

The vapor weight percents were determined using equations 4-3, 4-4, 4-5, and 4-6 from AP-42 section 7.1.4, dated 9/97, and the liquid weight percents taken from Table 3-1 of API Publication 1673.

- (4) Gasoline and Transmix Truck Loading (vapor tightness loss) - The individual HAP emissions from the gasoline and transmix truck loading shall be calculated by taking the product of the total VOC emissions and the HAP to VOC content (%). The HAP to VOC contents shall be as listed in Table 5-5 of API Publication 347, October 1988 and as listed in Table C-5 of the Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards (EPA 453/R-94-002a):

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- a. benzene - 0.7%
 - b. toluene - 1.1%
 - c. ethylbenzene - 0.1%
 - d. xylene - 0.4%
 - e. hexane - 1.4%
 - f. isooctane - 0.7%
- (5) Fugitive - The individual HAP emissions from fugitive emissions shall be calculated by taking the product of the total VOC emission rate and the liquid weight of each HAP in gasoline. The liquid weight percents shall be based off of potential estimates as follows;
- a. benzene - 4.8%
 - b. cumene - 5%
 - c. naphthalene - 5%
 - d. toluene - 30%
 - e. xylene - 25%
 - f. ethylbenzene - 5%
 - g. isooctane - 5%
 - h. hexane - 5%
- (6) Storage Tanks* - The individual HAP emissions from storage tanks shall be calculated using the partial speciation function of the most recent version of USEPA's "Tanks" program.
- (7) Permit Exempt and "DeMinimis" emissions units - The individual HAP emissions from permit exempt (OAC rule 3745-31-03) and "de minimis" (OAC rule 3745-15-05) emissions units shall be determined using approved methods (i.e., for boilers AP-42 Chapter 1.4 and for storage tanks using the partial speciation function of the most recent version of USEPA's "Tanks" program).
- (8) For each individual HAP, the sum of 6.b)(1) + 6.b)(2) + 6.b)(3) + 6.b)(4) + 6.b)(5) + 6.b)(6) + 6.b)(7), and then dividing by 2000 pounds per ton. For combined HAPs emissions, sum all the individual HAP emissions.

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, Akron Regional Air Quality Management District, and the permittee.

Draft Permit-to-Install and Operate

Sunoco Partners Marketing & Terminals LP

Permit Number: P0108238

Facility ID: 1677010377

Effective Date: To be entered upon final issuance

7. The Ohio EPA has determined that this facility may be applicable 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

Effective Date: To be entered upon final issuance

1. T003, Tanks #12 and #13

Operations, Property and/or Equipment Description:

630,000 gallons above ground fixed roof storage tank and 1,260,000 gallons above ground fixed roof storage tank - Tanks #12 and #13

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

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

a. None.

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-21-09 (L)	Exempt, See c)(1) below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart R)	See 2 through 6 of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

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 1.52 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for each storage tank:
 - a. The types of petroleum liquids stored in the tank.
 - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

e) Reporting Requirements

- (1) If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute, and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence.
- (2) 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 PER 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) None.

g) Miscellaneous Requirements

- (1) None.

Effective Date: To be entered upon final issuance

2. T008, Tank #16

Operations, Property and/or Equipment Description:

840,000 above ground internal floating roof storage tank - Tank #16

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

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

a. None.

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-21-09 (L)	Seeb)(2)a. through b)(2)c. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart R)	See 2 through 6 of Section B - Facility-Wide Terms and Conditions.
c.	40 CFR Part 60, Subpart K	The permittee shall store petroleum liquids as follows: i. If the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents. ii. If the true vapor pressure of the petroleum liquid, as stored, is greater than 570 mm Hg (11.1 psia), the storage

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		vessel shall be equipped with a vapor recovery system or its equivalent.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

- (1) None.

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

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

- a. the petroleum liquid stored;
- b. the period of storage; and
- c. the maximum true vapor pressure of that liquid during the respective storage period.

- (3) Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (4) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.0 psia), or whose physical properties preclude determination by the recommended method, is to be determined from available data and recorded if the estimated true vapor pressure is greater than 6.9 kPa (1.0 psia).

e) Reporting Requirements

- (1) 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 PER 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) None.

g) Miscellaneous Requirements

- (1) None.

3. T009, Tank #10

Operations, Property and/or Equipment Description:

445,000 gallons above ground internal floating roof storage tank - Tank #10

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)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-21-09 (L)	When storing petroleum liquids, the storage tanks shall comply with b)(2)a. through b)(2)c. below.
b.	None	When storing ethanol, the storage tank's only applicable rule/requirements is OAC rule 3745-31-05(D) below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart R)	See 2 through 6 of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

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, and the rim vents, if provided, shall

be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

- c. 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.

c) Operational Restrictions

- (1) None.

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

e) Reporting Requirements

- (1) 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 PER 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) None.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Group 1: T001,T010,T011,

EU ID	Operations, Property and/or Equipment Description
T001	148,600 gallons above ground internal floating roof storage tank - Tank #1
T010	420,000 gallons above ground internal floating roof storage tank -Tank #11
T011	420,000 gallons above ground internal floating roof storage tank - Tank #14

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

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

a. None.

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-21-09 (L)	See b)(2)a. through b)(2)c. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart R)	See 2 through 6 of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

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

- c. 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.

c) Operational Restrictions

- (1) None.

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

e) Reporting Requirements

- (1) 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 PER 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) None

g) Miscellaneous Requirements

- (1) None.