

Facility ID: 0278060355 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit J001](#)
- [Go to Part II for Emissions Unit T005](#)
- [Go to Part II for Emissions Unit T006](#)
- [Go to Part II for Emissions Unit T007](#)
- [Go to Part II for Emissions Unit T009](#)

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Facility ID: 0278060355 Emissions Unit ID: J001 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
loading rack with carbon adsorption/gasoline absorption vapor recovery unit.	OAC rule 3745-35-07(B)	Gasoline Loading:  Volatile organic compounds (VOC) emissions shall not exceed 0.50 pound of VOC per 1,000 gallons (60 mg/l) of gasoline loaded into the delivery vessel and 80.0 tons of VOC per year.  Distillate Loading (diesel fuels, fuel oil, and kerosene):  VOC emissions shall not exceed 0.02 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel and 3.0 tons of VOC per year.  The total annual VOC emissions from this emissions unit shall not exceed 83.0 tons.  HAPs: See section A.2.a below.  Total facility VOC's: See section A.2.b below.
	OAC rule 3745-21-09(Q)(1)(b)(ii)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(Q)	See sections B.2, B.3, B.4, B.5, B.6 and B.7 below.

2. **Additional Terms and Conditions**
  - (a) The emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for total combined HAPs. The VOC emissions from all emissions units at this facility shall not exceed 91.0 tpy.

**B. Operational Restrictions**

1. The annual throughput of gasoline and distillates shall not exceed 319,000,000 gallons and 300,000,000 gallons, respectively. Compliance with the annual gasoline and distillate throughput limitations shall be based upon rolling, 12-month summations of the gasoline and distillate throughput amounts.
2. The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:
  - a. all vapors displaced from the gasoline delivery vessel during loading are vented only to the vapor collection system; and

- b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
  - 3. The loading rack shall be equipped with a vapor control system whereby:
    - a. all vapors collected by the vapor collection system are vented to the vapor control system; and
    - b. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
  - 4. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
  - 5. All gasoline loading lines and vapor lines shall be equipped with fittings that are vapor tight.
  - 6. The permittee shall not permit gasoline to be spilled, discharged in sewers, stored in open containers or handled in any other manner that would result in evaporation.
  - 7. The permittee shall repair within fifteen days any leak from the vapor collection system and vapor control system which are employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than one-hundred percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
  - 8. The maximum exhaust gas VOC concentration shall not exceed 3% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 3% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation (60 mg/l), but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.]
- C. Monitoring and/or Record Keeping Requirements**
- 1. The permittee shall maintain monthly records of the following information:
    - a. the total, individual throughputs of gasoline and distillates; and
    - b. the rolling, 12-month summations of the individual throughputs of gasoline and distillates, in gallons.
  - 2. The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels, using the 40 CFR Part 60, Appendix A, Method 21 procedure for open ended lines. The highest VOC concentration, as measured during the processing of vapors during the last 5 minutes of the adsorption cycle for each vessel shall be recorded. The permittee shall maintain records of the monthly monitored VOC concentrations detected in the exhaust gases from the vapor recovery unit.
- D. Reporting Requirements**
- 1. The permittee shall submit semiannual deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitations of the throughput of gasoline and distillates.
 

These semiannual written reports shall include the following:

    - a. an identification of each deviation;
    - b. the probable cause of each deviation; and
    - c. any corrective actions or preventive measures which have been taken or will be taken.

If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period. The reports shall be submitted semiannually, i.e., by February 15 and August 15 of each year and shall address the data obtained during the previous calendar 6-month period (January to June and July to December, respectively).
  - 2. The permittee shall submit annual reports that specify the following:
    - a. the VOC, total HAPs and individual HAP emissions, in tons, for the entire facility;
    - b. the total throughput, in gallons, for gasoline and distillates for emissions unit J001; and
    - c. the total throughput, in gallons, and identification of type of fuel stored, for each of emissions units T005, T006, T007 and T009.

These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.
  - 3. The permittee shall submit semiannual reports indicating any exceedances of the VOC concentration limit, along with the cause of the exceedance and an explanation of any corrective action taken to prevent a similar exceedance in the future. These semiannual reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous six calendar months (January to June and July to December, respectively).
- E. Testing Requirements**
- 1. The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)
 

Approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit, the permittee shall conduct or have conducted, an emission test(s) for this emission unit in order to demonstrate continuing compliance with the allowable VOC emission rate. This test shall be done between the months of May through September.

Not later than 30 days prior to proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Northeast District Office shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

2. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

VOC emissions shall not exceed 0.50 pound of VOC per 1,000 gallons (60 mg/l) of gasoline loaded into the delivery vessel.

Applicable Compliance Method:

OAC rule 3745-21-10(E)

Emission Limitation:

VOC emissions shall not exceed 80.0 tons of VOC per year from the loading of gasoline.

Applicable Compliance Method:

The actual emissions shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:

VOC emissions shall not exceed 0.02 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel.

Applicable Compliance Method:

Compliance shall be demonstrated using an emission factor of 0.016 pound of VOC per thousand gallons of kerosene and an emission factor of 0.014 pound of VOC emissions per thousand gallons of distillate. These VOC emission factors were obtained from AP42, 5th Edition, Chapter 5, Section 5.2, Table 5.2-5, dated January, 1995.

Emission Limitation:

VOC emissions shall not exceed 3.0 tons of VOC per year from the loading of distillates.

Applicable Compliance Method:

The actual emissions shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:

The VOC emissions from all emissions units at this facility shall not exceed 91.0 tpy.

Applicable Compliance Method:

In order to calculate VOC emissions, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" or 0.33 tpy based on maximum potential to emit as calculated in the permit application.

iii. Actual emissions from the VOC vapor control system shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.

iv. VOC emissions from distillates loading shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitations:

The emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for

the year (in tpy) for all emissions units at the facility:

- Hexane - 0.016 pound of hexane emissions per pound of VOC;
- Benzene - 0.009 pound of benzene emissions per pound of VOC;
- Toluene - 0.013 pound of toluene emissions per pound of VOC;
- 2,2,4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
- Xylenes - 0.005 pound of xylenes emissions per pound of VOC; and
- Ethyl Benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

**F. Miscellaneous Requirements**

1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms and conditions of this PTO are federally enforceable requirements.

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Facility ID: 0278060355 Emissions Unit ID: T005 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1,680,000-gallon, fixed roof storage tank, equipped with an internal floating roof, for gasoline storage tank # 6 (T005)	OAC rule 3745-35-07(B)	See sections A.2.a and B.1.d below.
	OAC rule 3745-21-09(L)	See sections B.1.a, B.1.b and B.1.c below.

**2. Additional Terms and Conditions**

- (a) Combined annual emissions from all emissions units at this facility shall not exceed the following:
  - 91.0 tons of VOC;
  - 9.9 tons of any individual hazardous air pollutant (HAP); and
  - 24.9 tons of total combined HAPs.

**B. Operational Restrictions**

1. The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. The total gasoline throughput for this emissions unit shall not exceed 198,700,000 gallons per year, as a rolling, 12-month summation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information:
  - a. the types of petroleum liquids stored in this storage tank; and
  - 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 monthly records of the following information:
  - a. the total throughput of gasoline, in gallons; and

b. the rolling, 12-month summation of the gasoline throughputs, in gallons.

3. The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections E.1.a and E.1.b.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation for the gasoline throughput.

2. The permittee shall submit annual reports that specify the following:

a. the VOC, individual HAP and total combined HAPs emissions, in tons, for the entire facility;

b. the total throughput, for gasoline and distillates in gallons, for emissions unit J001; and

c. the total throughput, in gallons, and identification of type of fuel stored, for each of emissions units T005, T006, T007 and T009.

These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 91.0 tons of VOC.

Applicable Compliance Method:

In order to calculate VOC emissions, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" or 0.33 tpy based on maximum potential to emit as calculated in the permit application.

iii. Actual emissions from the VOC vapor control system shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.

iv. VOC emissions from distillates loading shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for the year (in tpy) for all emissions units at the facility:

Hexane - 0.016 pound of hexane emissions per pound of VOC;

Benzene - 0.009 pound of benzene emissions per pound of VOC;

Toluene - 0.013 pound of toluene emissions per pound of VOC;

2,2,4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;

Xylenes - 0.005 pound of xylenes emissions per pound of VOC; and

Ethyl Benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

**F. Miscellaneous Requirements**

1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms and conditions of this PTO are federally enforceable requirements.

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Facility ID: 0278060355 Emissions Unit ID: T006 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the

exception of those listed below which are enforceable under state law only.

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
630,000-gallon, fixed roof storage tank, equipped with an internal floating roof, for gasoline storage tank # 7 (T006)	OAC rule 3745-35-07(B)	See sections A.2.a and B.1.d below.
	OAC rule 3745-21-09(L)	See sections B.1.a, B.1.b and B.1.c below.

**2. Additional Terms and Conditions**

- (a) Combined annual emissions from all emissions units at this facility shall not exceed the following:
  - 91.0 tons of VOC;
  - 9.9 tons of any individual hazardous air pollutant (HAP); and
  - 24.9 tons of total combined HAPs.

**B. Operational Restrictions**

- 1. The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. The total gasoline throughput for this emissions unit shall not exceed 58,100,000 gallons per year, as a rolling, 12-month summation.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain records of the following information:
  - a. the types of petroleum liquids stored in this storage tank; and
  - 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 monthly records of the following information:
  - a. the total throughput of gasoline, in gallons; and
  - b. the rolling, 12-month summation of the gasoline throughputs, in gallons.
- 3. The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections E.1.a and E.1.b.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation for the gasoline throughput.
- 2. The permittee shall submit annual reports that specify the following:
  - a. the VOC, individual HAP and total combined HAPs emissions, in tons, for the entire facility;
  - b. the total throughput, for gasoline and distillates in gallons, for emissions unit J001; and
  - c. the total throughput, in gallons, and identification of type of fuel stored, for each of emissions units T005, T006, T007 and T009.

These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 91.0 tons of VOC.

Applicable Compliance Method:

In order to calculate VOC emissions, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" or 0.33 tpy based on maximum potential to emit as calculated in the permit application.
- iii. Actual emissions from the VOC vapor control system shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.
- iv. VOC emissions from distillates loading shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:  
 Combined annual emissions from all emissions units at this facility shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for the year (in tpy) for all emissions units at the facility:

- Hexane - 0.016 pound of hexane emissions per pound of VOC;
- Benzene - 0.009 pound of benzene emissions per pound of VOC;
- Toluene - 0.013 pound of toluene emissions per pound of VOC;
- 2,2,4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
- Xylenes - 0.005 pound of xylenes emissions per pound of VOC; and
- Ethyl Benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

**F. Miscellaneous Requirements**

- 1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms and conditions of this PTO are federally enforceable requirements.

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Facility ID: 0278060355 Emissions Unit ID: T007 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
630,000-gallon, fixed roof storage tank, equipped with an internal floating roof, for gasoline storage tank # 8 (T007)	OAC rule 3745-35-07(B)	See sections A.2.a and B.1.d below.
	OAC rule 3745-21-09(L)	See sections B.1.a, B.1.b and B.1.c below.

**2. Additional Terms and Conditions**

- (a) Combined annual emissions from all emissions units at this facility shall not exceed the following:
  - 91.0 tons of VOC;

9.9 tons of any individual hazardous air pollutant (HAP); and  
24.9 tons of total combined HAPs.

**B. Operational Restrictions**

1. The fixed roof storage tank shall be equipped with an internal floating roof.  
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.  
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.  
The total gasoline throughput for this emissions unit shall not exceed 74,500,000 gallons per year, as a rolling, 12-month summation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information:
  - a. the types of petroleum liquids stored in this storage tank; and
  - 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 monthly records of the following information:
  - a. the total throughput of gasoline, in gallons; and
  - b. the rolling, 12-month summation of the gasoline throughputs, in gallons.
3. The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections E.1.a and E.1.b.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation for the gasoline throughput.
2. The permittee shall submit annual reports that specify the following:
  - a. the VOC, individual HAP and total combined HAPs emissions, in tons, for the entire facility;
  - b. the total throughput, for gasoline and distillates in gallons, for emissions unit J001; and
  - c. the total throughput, in gallons, and identification of type of fuel stored, for each of emissions units T005, T006, T007 and T009.

These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 91.0 tons of VOC.

Applicable Compliance Method:

In order to calculate VOC emissions, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" or 0.33 tpy based on maximum potential to emit as calculated in the permit application.

iii. Actual emissions from the VOC vapor control system shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.

iv. VOC emissions from distillates loading shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for the year (in tpy) for all emissions units at the facility:

Hexane - 0.016 pound of hexane emissions per pound of VOC;  
Benzene - 0.009 pound of benzene emissions per pound of VOC;  
Toluene - 0.013 pound of toluene emissions per pound of VOC;

- 2,2,4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;
- Xylenes - 0.005 pound of xylenes emissions per pound of VOC; and
- Ethyl Benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

**F. Miscellaneous Requirements**

- 1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms and conditions of this PTO are federally enforceable requirements.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 0278060355 Emissions Unit ID: T009 Issuance type: Draft State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1,680,000-gallon, fixed roof storage tank, equipped with an internal floating roof, for gasoline storage tank # 5 (T009)	OAC rule 3745-35-07(B)	See sections A.2.a and B.1.d below.
	OAC rule 3745-21-09(L)	See sections B.1.a, B.1.b and B.1.c below.

**2. Additional Terms and Conditions**

- (a) Combined annual emissions from all emissions units at this facility shall not exceed the following:
  - 91.0 tons of VOC;
  - 9.9 tons of any individual hazardous air pollutant (HAP); and
  - 24.9 tons of total combined HAPs.

**B. Operational Restrictions**

- 1. The fixed roof storage tank shall be equipped with an internal floating roof. 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. 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. The total gasoline throughput for this emissions unit shall not exceed 198,700,000 gallons per year, as a rolling, 12-month summation.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain records of the following information:
  - a. the types of petroleum liquids stored in this storage tank; and
  - 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 monthly records of the following information:
  - a. the total throughput of gasoline, in gallons; and
  - b. the rolling, 12-month summation of the gasoline throughputs, in gallons.
- 3. The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and total combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections E.1.a and E.1.b.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation for the gasoline throughput.
2. The permittee shall submit annual reports that specify the following:
  - a. the VOC, individual HAP and total combined HAPs emissions, in tons, for the entire facility;
  - b. the total throughput, for gasoline and distillates in gallons, for emissions unit J001; and
  - c. the total throughput, in gallons, and identification of type of fuel stored, for each of emissions units T005, T006, T007 and T009.

These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 91.0 tons of VOC.

Applicable Compliance Method:

In order to calculate VOC emissions, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined using the latest version of USEPA's "Tanks Program."

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" or 0.33 tpy based on maximum potential to emit as calculated in the permit application.

iii. Actual emissions from the VOC vapor control system shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2000 lbs/ton.

iv. VOC emissions from distillates loading shall be calculated as the product of 0.02 pound of VOC per 1,000 gallons times the gallons of distillates loaded during the year, divided by 2000 lbs/ton.

Emission Limitation:

Combined annual emissions from all emissions units at this facility shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors from the "Gasoline Distribution Industry (Stage 1) - Background Information for Proposed Standards Draft Report" by the actual annual VOC emission rate for the year (in tpy) for all emissions units at the facility:

Hexane - 0.016 pound of hexane emissions per pound of VOC;  
Benzene - 0.009 pound of benzene emissions per pound of VOC;  
Toluene - 0.013 pound of toluene emissions per pound of VOC;  
2,2,4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC;  
Xylenes - 0.005 pound of xylenes emissions per pound of VOC; and  
Ethyl Benzene - 0.001 pound of ethyl benzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

**F. Miscellaneous Requirements**

1. By request of the applicant and pursuant to OAC rule 3745-35-07, the special terms and conditions of this PTO are federally enforceable requirements.