



Environmental
Protection Agency

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

10/13/2011

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

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

Facility ID: 0215020249
Permit Number: P0108873
Permit Type: Administrative Modification
County: Columbiana

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

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

Facility ID: 0215020249
Permit Number: P0108873
Permit Type: Administrative Modification
Issued: 10/13/2011
Effective: 10/13/2011
Expiration: 8/25/2016



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

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Authorization

Facility ID: 0215020249
Application Number(s): M0001411
Permit Number: P0108873
Permit Description: Administrative modification to remove last two sentences from term 4.c)(1) of P0108290 on page 33 of 39.
Permit Type: Administrative Modification
Permit Fee: \$1,900.00
Issue Date: 10/13/2011
Effective Date: 10/13/2011
Expiration Date: 8/25/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

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

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

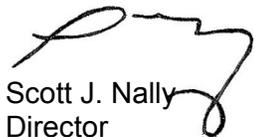
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108873
Permit Description: Administrative modification to remove last two sentences from term 4.c)(1) of P0108290 on page 33 of 39.

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

Group Name: Internal Floating Roof Tanks

| | |
|-----------------------------------|------------------|
| Emissions Unit ID: | T005 |
| Company Equipment ID: | Storage Tank #5 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T006 |
| Company Equipment ID: | Storage Tank #6 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T007 |
| Company Equipment ID: | Storage Tank #7 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T008 |
| Company Equipment ID: | Storage Tank #8 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T009 |
| Company Equipment ID: | Storage Tank #9 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T010 |
| Company Equipment ID: | Storage Tank #10 |
| Superseded Permit Number: | P0108290 |
| General Permit Category and Type: | Not Applicable |

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by 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) Allowable Facility-Wide Emission Limitation:
 - a. Volatile organic compound (VOC) emissions shall not exceed 89.65 tons per rolling, 12-month period.
 - (2) Operational Restrictions:
 - a. The overall throughput of gasoline or lower vapor pressure product for storage in the tanks with an internal floating roof shall not exceed 200,000,000 gallons per rolling, 12-month period.*
 - b. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for storage in any of the tanks shall not exceed 200,000,000 gallons per rolling, 12-month period.*
 - c. The overall throughput of gasoline or lower vapor pressure product for truck loading shall not exceed 100,000,000 gallons per rolling, 12-month period.
 - d. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for truck loading shall not exceed 100,000,000 gallons per rolling, 12-month period.
 - e. The overall throughput of gasoline or lower vapor pressure product for barge loading shall not exceed 100,000,000 gallons per rolling, 12-month period.
 - f. The overall throughput of distillate fuel oil No. 2 or lower vapor pressure product for barge loading shall not exceed 100,000,000 gallons per rolling, 12-month period.
 - g. The vapor control unit (VCU) shall be operated whenever gasoline is loaded into a truck or barge.
 - (3) Monitoring and/or Recordkeeping Requirements:
 - a. The permittee shall collect and record the following information each month:

- i. the overall throughput of gasoline or lower vapor pressure product in the tanks with an internal floating roof;
 - ii. the overall throughput of distillate fuel oil No. 2 or lower vapor pressure product in any of the tanks;
 - iii. the throughput of gasoline or lower vapor pressure product loaded into trucks;
 - iv. the throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into trucks;
 - v. the throughput of gasoline or lower vapor pressure product loaded into barges;
 - vi. the throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into barges;
 - vii. the rolling, 12-month throughput of gasoline or lower vapor pressure product in the tanks with an internal floating roof, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;
 - viii. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product in the tanks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;
 - ix. the rolling, 12-month throughput of gasoline or lower vapor pressure product loaded into trucks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;
 - x. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into trucks, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months;
 - xi. the rolling, 12-month throughput of gasoline or lower vapor pressure product loaded into barges, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months; and
 - xii. the rolling, 12-month throughput of distillate fuel oil No. 2 or lower vapor pressure product loaded into barges, calculated by the adding the current month's throughput to the monthly sum of the preceding eleven calendar months.
- b. The permittee shall record any time when the VCU was not in operation when gasoline was loaded into a truck or barge. The record shall include the date, time, duration and reason.

c.

(4) Reporting Requirements:

- a. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - i. an identification of any month when any of the rolling, 12-month throughput limitations as specified in B.1.b)(2) are exceeded;
 - ii. the actual throughput for the limitation that was exceeded; and
 - iii. an identification of any month when the VCU was not in operation when gasoline was loaded into a truck or barge.

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

(5) Testing Requirements:

- a. Compliance with the facility-wide VOC emission limitation of 89.65 tons per rolling, 12-month period is assumed if the throughput limitations in B.1.b)(2) are not exceeded.
- c) The Ohio EPA has determined that this facility is subject to the requirements of an area source MACT/GACT rule (40 CFR Part 63, Subpart BBBB) that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:

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

C. Emissions Unit Terms and Conditions

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

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

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

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

a. None.

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | Requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb. See c)(1), c)(2) and c)(3). |
| b. | OAC rule 3745-31-05(D)(1)(b) | See B.2 under Facility-Wide Terms and Conditions |
| c. | OAC rule 3745-21-09(L) | See c)(4), d)(1), d)(2) and e)(1). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| d. | 40 CFR Part 60, Subpart Kb | See b)(2)a, b)(2)b, d)(1), d)(3) through d)(9), e)(2) through e)(4) and g)(1). |

(2) Additional Terms and Conditions

- a. The permittee shall maintain a fixed roof in combination with an internal floating roof meeting the following specifications, while storing high vapor pressure product. High vapor pressure product is defined as a product with a maximum true vapor pressure greater than or equal to 3.5 kilopascals (0.5076 psi):
 - i. the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible;
 - ii. each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (a) a foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (b) two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - (c) a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - iii. each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface;
 - iv. each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be

maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;

- v. automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
- vi. rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;
- vii. each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;
- viii. each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and
- ix. each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

- b. The requirements of 40 CFR Part 60, Subpart Kb do not apply when a tank holds a product or liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5076 psi).

c) Operational Restrictions

- (1) The permittee shall hold gasoline or lower vapor pressure product; or liquid fertilizer in emissions units T005, T006, T007, T008, T009 and T010.
- (2) Emissions units T007 and T008 shall be equipped with electric heating for when they hold low vapor pressure products. The low vapor pressure product shall not be heated to a vapor pressure greater than gasoline with an RVP of 13.5 psia at ambient temperature.
- (3) The permittee shall employ submerged filling in emissions units T005, T006, T007, T008, T009 and T010.
- (4) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers, prior to storing high vapor pressure product as follows. High vapor pressure product is defined as a product with a maximum true vapor pressure greater than or equal to 3.5 kilopascals (0.5076 psi):
 - a. each fixed roof storage tank shall be equipped with an internal floating roof;
 - b. the automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports;

- c. the rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports; and
- d. all openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) **Monitoring and/or Recordkeeping Requirements**

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

- a. the types of petroleum liquids stored in each tank;
- b. the period of storage; and
- c. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules, while storing high vapor pressure product. High vapor pressure product is defined as a product with a maximum true vapor pressure greater than or equal to 3.5 kilopascals (kPa) or 0.5076 psi.
- (3) The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel. This requirement is not applicable when the tank holds a product or liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5076 psi).
- (4) For tanks equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA Northeast District Office in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. This requirement is not applicable

when the tank holds a product or liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5076 psi).

- (5) For tanks equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B), the permittee shall visually inspect the tank as specified in §60.113b(a)(4) at least every 5 years; or as specified in §60.113b(a)(2). This requirement is not applicable when the tank holds a product or liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5076 psi).
 - (6) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in §60.113b(a)(3)(i). This requirement is not applicable when the tank holds a product or liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5076 psi).
 - (7) The permittee shall keep a record of each inspection performed as required by 60.113b(a). Each record shall identify the storage vessel on which the inspection and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
 - (8) The permittee shall keep copies of all records required by 40 CFR Part 60, Subpart Kb, except for the record required by §60.116b(b), for at least 2 years.
 - (9) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record will be kept for the life of the emissions unit.
- e) Reporting Requirements
- (1) The permittee shall notify the Ohio EPA Northeast District Office within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
 - (2) The permittee shall notify the Ohio EPA Northeast District Office in writing at least 30 days prior to the filling or refilling with high vapor pressure product, of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Ohio EPA Northeast District Office the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Ohio EPA Northeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA Northeast District Office at least 7 days prior to the refilling. High vapor pressure product is defined as a product with a maximum true vapor pressure greater than or equal to 3.5 kilopascals (0.5076 psi).

- (3) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - (4) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Ohio EPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.
 - (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) None.
- g) Miscellaneous Requirements
- (1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below:
 - a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. The mean temperature for a given month is pre-determined by the mean temperature for that month over the past 5 years or greater.
 - b. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator

specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
 - c. For other liquids, the vapor pressure:
 - i. may be obtained from standard reference texts; or
 - ii. determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or
 - iii. measured by an appropriate method approved by the Administrator; or
 - iv. calculated by an appropriate method approved by the Administrator.
- (2) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for these air contaminant sources.