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

Certified Mail

10/17/2011

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

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010377
Permit Number: P0108752
Permit Type: Administrative Modification
County: Summit

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 Akron Regional Air Quality Management District at (330)375-2480 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

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

Cc: ARAQMD

Ohio | Environmental Protection Agency

FINAL

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

Facility ID:	1677010377
Permit Number:	P0108752
Permit Type:	Administrative Modification
Issued:	10/17/2011
Effective:	10/17/2011
Expiration:	1/22/2014

Ohio Environmental Protection Agency

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): M0001386
Permit Number: P0108752
Permit Description: Administrative modification of Permit to Install and Operate P0104347 issued final on January 22, 2009 to modify the throughput limitations, to change the method used to monitor the VOC from the exhaust gas, and to remove the monitoring of the vapor collection system.
Permit Type: Administrative Modification
Permit Fee: $625.00
Issue Date: 10/17/2011
Effective Date: 10/17/2011
Expiration Date: 1/22/2014
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

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: P0108752
Permit Description: Administrative modification of Permit to Install and Operate P0104347 issued final on January 22, 2009 to modify the throughput limitations, to change the method used to monitor the VOC from the exhaust gas, and to remove the monitoring of the vapor collection system.

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

Emissions Unit ID:	**J001**
Company Equipment ID:	Truck Loading
Superseded Permit Number:	P0104347
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 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 submitting[1] 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.

[1]Permittees 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 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 and225,000,000 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, thepermittee 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 emission 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).

(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 DeMinimis 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 of6.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. napthalene- 0.0087 pound of napthalene 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):

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. napthalene- 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 of6.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.

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 following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. J001, Truck Loading

Operations, Property and/or Equipment Description:

Distillate and gasoline loading rack and a vapor recovery unit as control.

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. and b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	164.13 pounds of volatile organic compounds (VOC) per hour All of the VOC emissions from gasoline and transmix loading shall be vented to the carbon adsorber. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(Q) and 3745-31-05(D). See b)(2)a. below.
b.	OAC 3745-21-09 (Q)	The VOC emissions from the vaporcontrol system shall not exceed 0.67 pound of VOC per 1000gallons (80 milligrams of VOC per liter) of gasoline loaded into thedelivery vessel.
c.	OAC rule 3745-31-05(D)	See 2 through 6 of Section B - Facility-Wide Terms and Conditions.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart R)	

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation is based on the emissions unit's potential to emit.Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

(1) The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:

a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and

b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.

(2) 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.

(3) 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.

(4) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

(5) The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

(6) The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

(7) The maximum exhaust gas VOC concentration shall not exceed 4% (as propane) from the carbon adsorption vessels. [A VOC concentration that exceeds 4% (as propane) is not necessarily indicative of a violation of the allowable mass emission limitation (80 milligrams of VOC per liter of gasoline loaded), but rather serves as a trigger level for

maintenance and/or repair activities, or further investigation to establish correct operation.]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform monthly monitoring of the exhaust gas VOC concentration from both carbon adsorption vessels on the vapor recovery unit using eitherthe 40 CFR 60, Appendix A, Method 21 procedure for open ended lines or a permanently mounted VOC analyzer in lieu of a handheld analyzer as long as the analyzer is installed, operated and maintained per the manufacturer's specifications. The highest VOC concentration, as measured during the processing of vapors during the last five 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.

(2) The permittee shall perform monthly monitoring all potential sources of vapor leaks from the terminal's vapor collection system and vapor control system while a gasoline tank truck is being loaded. Where vapor leaks are determined to be equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10, the permittee shall maintain a record of the following information:

a. the date the leak was detected;

b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;

c. the leak detection method;

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and

f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

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 shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 90 days of startup of the new vapor recovery unit (carbon adsorber).

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC in pound of VOC per 1000 gallons (milligrams of VOC per liter) of gasoline loaded.

c. The VOC emission rates shall be determined in accordance with the methods and procedures contained in 40 CFR Part 60.503(b) and (c) of "Subpart XX - Standards of Performance for Bulk Gasoline Terminals," except that the gasoline throughput during any test shall be not less than ninety per cent of the maximum throughput of the loading rack(s) and not less than eighty thousand gallon as describedin f)(1)c.ii.below.

i. Immediately before the performance test required to determined compliance, the permittee shall use Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

ii. The permittee shall determine compliance as follows:

(a) The performance test shall be 6 hours long during which at least 80,000 gallons of gasoline is loaded. If this is not possible, the test may be continued the same day until 80,000 gallons of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 80,000 gallon criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

(b) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

(c) The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E=K\sum_{i=1}^{n}(V_{esi}C_{ei})/(L10^{6})$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{esi} = volume of air-vapor mixture exhausted at each interval "i", scm.

C_{ei} = concentration of total organic compounds at each interval "i", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.

i = emission testing interval of 5 minutes.

K = density of calibration gas, 1.83×10^6 for propane and 2.41×10^6 for butane, mg/scm.

(d) The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

(e) The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:

(i) Method 2B shall be used for combustion vapor processing systems.

(ii) Method 2A shall be used for all other vapor processing systems.

(f) Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.

(g) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

d. During any test, all loading racks shall be open for each product line which is controlled by the system under test. Simultaneous use of more than one loading rack shall occur to the extent that such use would normally occur.

e. Simultaneous use of more than one dispenser on each loading rack shall occur to the extent that such use would normally occur.

f. Dispensing rates shall be set at the maximum rate at which the equipment is typically operated. Automatic product dispensers are to be used according to normal operating practices.

g. Applicable operating parameters of the vapor control system shall be monitored to demonstrate that the control unit is operating at design levels. Delivery devices shall be leak free.

h. For each gasoline tank truck loaded during the test period, all potential sources of leaks shall be checked in accordance with the method specified in f)(1)j. below. The tank identification number, the latest leak check certification date, and the location and highest detector reading for each incident of leakage shall be recorded.

i. During each test, all potential sources of leaks in the vapor collection and control systems shall be monitored in accordance with the method specified in f)(1)j. below. The location and highest detector reading for each incident of leakage shall be recorded.

j. This method describes the procedures to be followed for detecting leaks of gasoline vapors by means of a portable hydrocarbon gas analyzer, which is calibrated to read in per cent of the lower explosive limit as propane.

i. The following equipment are used:

(a) A liquid manometer, or equivalent device, capable of measuring up to twenty-five inches of water gauge pressure with a precision of plus or minus 0.1 inch of water; and

(b) A portable hydrocarbon gas analyzer which:

(i) Is equipped with a sampling line of sufficient length for easy maneuverability during testing and a sampling probe having an internal diameter of 0.25 inch;

(ii) Is certified as safe for operation in explosive atmospheres;

(iii) Has a minimum range of zero to one hundred per cent of the lower explosive limit as propane; and

(iv) Has a response time for full-scale deflection of less than eight seconds with sampling line and probe attached.

ii. The portable hydrocarbon gas analyzer is calibrated with 2.2 per cent propane by volume in air (or equivalent calibration gas) for one hundred per cent of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

iii. The test procedures for detecting leaks are the following:

(a) Connect the liquid manometer to a pressure tap in the vapor control system, vapor collection system, or the vapor balance

system as close as possible to the connection with the gasoline tank truck;

(b) Record the pressure periodically during loading of the gasoline tank truck;

(c) Check with the portable hydrocarbon gas analyzer all potential leak sources on the gasoline tank truck during loading and on the vapor control system, vapor collection system, or vapor balance system by:

(i) Maintaining the probe's inlet about one inch from the potential leak source in the path of (parallel to) the vapor flow from a leak;

(ii) Moving the probe slowly around the periphery of the potential leak source to locate the point of highest meter response;

(iii) Blocking as much as possible the wind from the area being monitored; and

(d) Record the location of leakage and the highest detector reading for each incidence of leakage.

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

(3) Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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

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

a. Emission Limitation:

0.67 pound of VOC per 1000 gallons of gasoline loaded into the delivery vessel

Applicable Compliance Method:

Compliance with the pound VOC per 1000 gallons of gasoline loaded emission limitation above shall be based upon the results of emission tests conducted in accordance with the procedures outlined in f)(1)through f)(4) above.

b. Emission Limitation:

164.13 pounds of VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determinedusing the following equation:

E = [(R x (0.00067 lb of VOC/gallon* + 0.000075 lb of VOC/gallon**)) + (S x 0.00014 lb of VOC/gallon***) + ((0.00002866 lb/hr-source****) x T) + ((0.0000947 lb/hr-source****) x U) + ((0.00009038 lb/hr-source****) x V) + ((0.00001719 lb/hr-source****) x W) + ((0.001168 lb/hr-source****) x X) + ((0.0002645 lb/hr-source****) x Y) + ((0.0002866 lb/hr-source****) x Z)]

E = the hourly allowable VOC emission limitation

R = the maximum hourly throughput of transmix and gasoline, in gallons

S = the maximum hourly throughput of distillates, in gallons

T = number of valves in gas service

U = number of valves in light liquid service

V = number of fittings in gas service

W = number of fittings in light liquid service

X = number of pumps in light liquid service

Y = number of other sources not categorized in gas service

Z = number of other sources not categorized in light liquid service

*Allowable emission limitation for VOC.

**The emission factor is 9.0 mg/liter leakage emission converted to lbs/gallon (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).

***Emission factor is from AP-42, Fifth Edition,Table 5.2-5, dated January 1995.

****Emission factors are from Table 2-3 in EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates" document.

g) Miscellaneous Requirements

(1) None.