



**Environmental
Protection Agency**

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

Certified Mail

7/5/2012

Mr. Chris Wood
Columbiana Transload
3773 Cherry Creek North Drive
Suite 1000
Denver, CO 80209

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

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

Facility ID: 0215012003
Permit Number: P0109777
Permit Type: Initial Installation
County: Columbiana

Dear Permit Holder:

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

Andrew Hall and Ohio EPA DAPC, Northeast District Office
Permit Review/Development Section 2110 East Aurora Road
Ohio EPA, DAPC Twinsburg, OH 44087
122 South Front Street
Columbus, Ohio 43215

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

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



Permit Strategy Write-Up

1. Source Description:

Columbiana Transload applied to install a transloading facility in a rail yard in Columbiana, Ohio. The facility is a loading rack, (J001) that provides a means to manage hoses to transfer Condensate from tank trucks into rail vessels. The emissions considered are the emissions generated from connecting hoses carrying condensate and hoses that make up the vapor balance system.

2. Facility Emissions and Attainment Status:

The Facility is in an attainment area for all criteria pollutants.

3. Source Emissions:

Those load loss calculations yielded 7.04 tons/year of VOC's emitted. The permittee has an integral vapor balance system which qualifies as BAT, as a "design efficiency of applicable air containment control device." The efficiency of the control device, 98.7% was supplied by the permittee.

4. Conclusion:

Terms and conditions regarding leak detection and monitoring, transfer of liquids and vapor control standards, were transposed from gasoline terms and conditions, found in OAC 3745-21-09 and OAC 3745-21-10. Although these rules are not specifically applicable to Condensate liquids, permit monitoring and recordkeeping is being modeled after these requirements to demonstrate ongoing compliance with the BAT limit. The Consideration of this process and using the Control Device as Integral was first done on a permit in the South East District Office.

5. Please provide additional notes or comments as necessary:

Vapor loss calculations were based on the maximum of 8 trucks unloading 24 hours/day, 365 days a year-a scenario supplied by the permittee. Since the emission control system, in the form of a vapor balance system, is integral to the loading process, controlled emissions were considered when performing vapor loss emission calculations.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>7.04</u>

PUBLIC NOTICE

7/5/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Columbiana Transload
41738 Esterly Dr,
Columbiana, OH 44408

Columbiana County

FACILITY DESC.: Support Activities for Rail Transportation

PERMIT #: P0109777

PERMIT TYPE: Initial Installation

PERMIT DESC: Tanker truck unloading into Railcar. Loading rack equipped with 1 - arm. Bottom load into railcar. Maximum capacity of 240,000 gallons per day.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Megan Talcott, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Columbiana Transload**

Facility ID:	0215012003
Permit Number:	P0109777
Permit Type:	Initial Installation
Issued:	7/5/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Columbiana Transload

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Authorization

Facility ID: 0215012003
Application Number(s): A0044166
Permit Number: P0109777
Permit Description: Tanker truck unloading into Railcar. Loading rack equipped with 1 - arm. Bottom load into railcar. Maximum capacity of 240,000 gallons per day.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/5/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Columbiana Transload
41738 Esterly Dr
Columbiana, OH 44408

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: P0109777

Permit Description: Tanker truck unloading into Railcar. Loading rack equipped with 1 - arm. Bottom load into railcar. Maximum capacity of 240,000 gallons per day.

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:	TL-1
Superseded Permit Number:	
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) None.

C. Emissions Unit Terms and Conditions



1. J001, Condensate Loading

Operations, Property and/or Equipment Description:

Loading of condensate from tanker trucks to railcars.

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. d)(6) and e)(6)

(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.

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) as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions shall not exceed 7.04 tons per year.</p> <p>See b)(2)a and b)(2)c through b)(2)h.</p>
b.	OAC Rule 3745-31-05(A)(3) as effective 12/1/2006	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminate source since the potential to emit for VOC is less than 10 tons per year.

- c. For any transfer of condensate from a tank truck to a railcar, the displaced vapors shall be collected by a vapor balance system. The vapor balance system shall be equipped with a vapor tight vapor line from the tanker truck to the rail vessels and a means to ensure that the vapor line is connected before condensate is transferred. The vapor balance system shall be designed and operated to route at least 99 percent of displaced vapors from the loading process back to the tanker truck.
- d. All condensate liquid loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.
- e. All leaks in liquid lines and vapor lines shall be repaired within five days after identification.
- f. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
- g. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
- h. The permittee shall not permit condensate liquids to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

- (1) The annual throughput rate of condensate liquids for this emissions unit shall not exceed 87,600,000 gallons per year.
- (2) The maximum hazardous air pollutant (HAP) content of all condensate liquids loaded shall not exceed 10 percent for any single HAP and 15 percent for total combined HAPs.
- (3) The vapor balance system shall be kept in good working order and shall be used at all times during the loading of condensate into railcars.
- (4) Unloading of liquid product from tank trucks shall be limited to vapor-tight tank trucks using the following procedures:
 - a. require the tank identification number to be recorded as each tank truck is unloaded at this emissions unit;

- b. not allow the unloading of nonvapor-tight trucks or trucks with an expired DOT inspection at this emissions unit; and
 - c. verify that the cargo tank has a current DOT inspection as indicated by the DOT marking, per 49 CFR Part 180, Subpart E and/or equivalent approved by the Ohio Environmental Protection Agency.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain a log of the downtime for the vapor balance system when this emissions unit is in operation.
 - (2) While condensate is being loaded, the permittee shall monitor the vapor balance system for leaks. If vapor leaks are detected, 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 5 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.
- (3) The permittee shall maintain a record of the cargo tank identification number and DOT test/inspection date from the cargo tank DOT marking in the log for each tank truck unloading at the facility.
 - (4) The permittee shall collect and maintain monthly records of the throughput of condensate for each month, in gallons.
 - (5) The permittee shall maintain records of percent individual and total combined HAP content of all condensate liquids loaded on a monthly basis.
 - (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air

contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations of the HAP content restrictions;
 - i. 10% individual HAP, 15% total combined HAP content;
 - b. each unloading of a tank truck for which vapor tightness documentation had not been previously obtained by the facility;
 - c. the probable cause of each deviation (excursion);
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Northeast District Office of the Ohio EPA.

- (2) 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.
- (3) The permittee shall submit deviation (excursion) reports that identify each day that condensate is transferred via the loading rack and the vapor balance system was not in operation. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a leak is detected in the vapor balance system or condensate transfer hoses other than from disconnection. Each report shall be submitted within 30 days after the deviation occurs.
- (5) Any leaks in vapor or liquid lines that are not repaired within 5 days after identification (in accordance with d)(2)) shall be reported to the Ohio EPA Northeast District office within 30 days after the repair is completed.
- (6) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air

Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 7.04 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equation:

$$E = (L_L)(T_c/1000)(\text{ton}/2000 \text{ lbs})(1-CE)$$

where:

E = emissions rate, in tons per year;

T_c = the annual condensate throughput, in gallons;

CE = the overall collection efficiency is calculated by multiplying the efficiency of the of the vapor balance system by the collection efficiency of the vapor-tight tank truck, expressed as decimals = 0.99 X 0.99 = 0.98; and

L_L = the loading loss factor derived using AP-42, Section 5.2, "Loading Loss Equation":

$$L_L = 12.46 \text{ SPM}/T$$

where:

L_L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 0.6 for submerged fill;

P = vapor pressure of liquid loaded @ 52 °F = 6;

M = molecular weight of vapor = 91.75; and

T = temperature of bulk liquid = 512°R.

g) Miscellaneous Requirements

- (1) None.