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

Certified Mail

8/7/2012

SHAUN KIZEWSKI
Arc Terminals Holdings, LLC
3000 RESEARCH FOREST DR SUITE 250
THE WOODLANDS, TX 77386

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318005897
Permit Number: P0108237
Permit Type: Renewal
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: CDAQ

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Arc Terminals Holdings, LLC

Facility ID:	1318005897
Permit Number:	P0108237
Permit Type:	Renewal
Issued:	8/7/2012
Effective:	8/7/2012
Expiration:	8/7/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Arc Terminals Holdings, LLC

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Authorization

Facility ID: 1318005897
Application Number(s): A0041064
Permit Number: P0108237
Permit Description: FEPTIO renewal permit for a bulk gasoline terminal. PTI 13-03948 was issued 1/16/03. This terminal stores (in numerous tanks) and loads gasoline, diesel, and ethanol. J001 and J002 use bottom loading arms to load gasoline, diesel, and ethanol into tank trucks and are equipped with flares. J003 is a specialty loading rack consisting of 3 fully submerged top loading arms for loading distillates into tank trucks. P002 is a lake barge loading operation consisting of two fully submerged fill tubes loading gasoline, distillates, and ethanol into barges.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/7/2012
Effective Date: 8/7/2012
Expiration Date: 8/7/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Arc Terminals Holdings, LLC
250 MAHONING AVE
CLEVELAND, OH 44113

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0108237
Permit Description: FEPTIO renewal permit for a bulk gasoline terminal. PTI 13-03948 was issued 1/16/03. This terminal stores (in numerous tanks) and loads gasoline, diesel, and ethanol. J001 and J002 use bottom loading arms to load gasoline, diesel, and ethanol into tank trucks and are equipped with flares. J003 is a specialty loading rack consisting of 3 fully submerged top loading arms for loading distillates into tank trucks. P002 is a lake barge loading operation consisting of two fully submerged fill tubes loading gasoline, distillates, and ethanol into barges.

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:	South Terminal Loading Rack
Superseded Permit Number:	13-03948
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J002**
Company Equipment ID:	Main Loading Rack
Superseded Permit Number:	13-03948
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J003**
Company Equipment ID:	Specialty Loading Rack
Superseded Permit Number:	13-03948
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Barge Loading
Superseded Permit Number:	13-03948
General Permit Category and Type:	Not Applicable

Group Name: T1

Emissions Unit ID:	**T001**
Company Equipment ID:	Tank 1
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T002**
Company Equipment ID:	Tank 2
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T2

Emissions Unit ID:	**T003**
Company Equipment ID:	Tank 3
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T004**
Company Equipment ID:	Tank 4
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**T007**
Company Equipment ID:	Tank 7
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T3

Emissions Unit ID:	**T005**
Company Equipment ID:	Tank 5
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Tank 6
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T4

Emissions Unit ID:	**T012**
Company Equipment ID:	Tank 18119
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T016**
Company Equipment ID:	Tank 18123
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T020**
Company Equipment ID:	Tank 18191
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T021**
Company Equipment ID:	Tank 18192
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T022**
Company Equipment ID:	Tank 18193
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T023**
Company Equipment ID:	Tank 18194
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T5

Emissions Unit ID:	**T013**
Company Equipment ID:	Tank 18120
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T014**
Company Equipment ID:	Tank 18121
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**T015**
Company Equipment ID:	Tank 18122
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T6

Emissions Unit ID:	**T017**
Company Equipment ID:	Tank 18124
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T018**
Company Equipment ID:	Tank 18125
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T019**
Company Equipment ID:	Tank 18190
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T024**
Company Equipment ID:	Tank 18195
Superseded Permit Number:	13-04548
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T025**
Company Equipment ID:	Tank 18214
Superseded Permit Number:	13-04548
General Permit Category andType:	Not Applicable

Group Name: T7

Emissions Unit ID:	**T034**
Company Equipment ID:	Tank 25414
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T035**
Company Equipment ID:	Tank 25415
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T036**
Company Equipment ID:	Tank 25416
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T037**
Company Equipment ID:	Tank 25417
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T038**
Company Equipment ID:	Tank 25418
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T039**
Company Equipment ID:	Tank 25419
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable

Group Name: T8

Emissions Unit ID:	**T054**
Company Equipment ID:	18196
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T055**
Company Equipment ID:	4001
Superseded Permit Number:	13-03948
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T056**
Company Equipment ID:	4002
Superseded Permit Number:	13-03948
General Permit Category andType:	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 takenby 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 Cleveland Division of Air Quality 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) c), d), e), f), g), h)(1), and h)(2)

c) 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(D)(1)(b) FEPTIO to avoid Title V and MACT Applicability	See b)(2)a. and b)(2)b. below.

(2) Additional Terms and Conditions

a. The total combined annual emissions from all facility emissions units, including permit to install and operate exempt and "de minimis" emissions units, shall not exceed 91.16 tons of volatile organic compounds (VOC) as a rolling, 12- month summation.

b. HAP emissions are restricted by the VOC emissions at a rate of 0.0585 lb HAP/lb VOC. Since the VOCs are restricted to 91.16 tons per year (TPY), the maximum HAP emissions are 5.33 tons per year (TPY).

d) Operational Restrictions

(1) Limit fuel throughput at the loading racks as specified in Section C.1.c)(1).

(2) Limit barge loading VOC emissions as specified in Section C.4.b)(1)b..

e) Monitoring and Recordkeeping Requirements

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

a. the calculated, total VOC emissions (in tons);

b. the rolling, 12-month summation of fuel throughput at the loading racks J001, J002, and J003 combined as specified in Section C.1.d)(1);

c. the rolling, 12-month summation of barge loading VOC emissions from loading rack P002 as specified in Section C.4.d)(1); and

d. the rolling, 12-month summations of VOC emissions (in tons) from gasoline, distillates, and ethanol for all emission units at the facility, in tons.

f) Reporting Requirements

(1) 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:

i. the rolling, 12-month VOC emission limitation of 91.16 tons;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

g) Testing Requirements

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

a. Emission Limitation:

91.16 TPY of VOC as a rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to d)(1) above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program or AP-42 Chapter 7.

ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."

iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).

iv. The VOC emissions from gasoline, distillate, or ethanol truck loading shall be determined, using AP- 42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

h) Miscellaneous Requirements

(1) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, 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 this rule are in effect and shall be enforced 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.

(2) The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart XX: J001, J002, and J003

The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb: T013, T014, and T015 which were converted to internal floating roof tanks in 3/01, 9/86, and 9/86 respectively.

The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Cleveland DAQ.

The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart XX and Subpart Kb. Compliance with all applicable requirements shall be achieved by the dates set forth in the respective subparts.

(3) Tanks that are DeMinimis under OAC rule 3745-15-05 are T048 and T057. Tanks that are exempt under OAC rule 3745-31-03 are T026 through T033, T040 through T045, and T047.

C. Emissions Unit Terms and Conditions

1. J001, South Terminal Loading Rack

Operations, Property and/or Equipment Description:

South terminal loading rack consisting of five bottom loading arms in two bays loading gasoline, distillates (K-1 kerosene, Jet A kerosene, low and high sulfur diesel fuel or distillate fuel oil number 2) and fuel ethanol into delivery vessels and equipped with a flare.

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)(3)

(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., c)(1), c)(5), d)(1), e)(2), f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-03948 issued 1/16/03	31.97 lbs/hr of Volatile Organic Compound (VOC) emissions Gasoline loading: 0.160 lb of VOC/1,000 gallons when loading gasoline RVP 9 (RVP = Reid vapor pressure, in pounds per square inch) into delivery vessels; 0.222 lb of VOC/1,000 gallons when loading gasoline RVP 13.5 into delivery vessels; and 0.209 lb of VOC/1,000 gallons when loading gasoline RVP 15 into delivery vessels

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Distillate loading: 0.00424 lb of VOC/1,000 gallons when loading distillates into delivery vessels Fuel ethanol loading: 0.0231 lb of VOC/1,000 gallons when loading fuel ethanol into delivery vessels See b)(2)a. below.
b.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from truck loading operations identified in this permit (J001, J002 and J003) shall not exceed 18.90 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility.
c.	40 CFR 63 Subpart R	See b)(2)b. below.
d.	40 CFR 60 Subpart XX	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(Q)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. This emissions unit (J001) shall be equipped with a vapor collection system whereby during the transfer of product to any delivery vessel:

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

ii. all vapors collected by the vapor collection system are vented to the vapor control system;

iii. a means shall be provided to prevent drainage of product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected; and

iv. all product loading lines and vapor lines shall be equipped with fittings that are vapor tight.

b. This emissions unit (J001) is not subject to 40 CFR 63 Subpart R because this facility is not a major source of HAPs.

c) Operational Restrictions

(1) Compliance with the combined emission limitations as stated in b)(1) for emissions units J001, J002 and J003 shall be achieved by restricting the annual throughput of gasoline, distillates, and fuel ethanol. The annual throughput of gasoline, distillates, and fuel ethanol, shall not exceed 145,000,000 gallons, 181,000,000 gallons and 210,000,000 gallons, respectively, based on a rolling, 12-month summation of the throughput for each material.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing fuel throughput and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

(2) The Reid Vapor Pressure (RVP) of gasoline loaded at emissions unit J001 shall meet the requirements of 40 CFR 80.27, the "Federal RVP Standard."

(3) Compliance with the annual volume throughput in gallons shall be based upon the rolling, 12-month summations of the monthly volume throughput in gallons.

(4) A pilot flame shall be maintained at all times in the flare's pilot light burner when this emissions unit is in operation.

(5) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs, emission rates, and the emission control efficiency by weight of the flare to calculate monthly actual VOC emissions generated by the facility.

(6) Compliance with the annual emission rate in tons shall be based upon the rolling, 12-month summations of the monthly emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following monthly emission information for this emissions unit and all other truck loading operations:

a. the total individual throughputs of gasoline, distillates and fuel ethanol at this emissions unit for each month, in gallons;

b. the rolling, 12-month summations of the total gasoline, distillates and fuel ethanol throughputs at this emissions unit, in gallons:

current month gallons of throughput + previous 11-months gallons of throughput = total 12-month gallons of throughput

c. the total VOC emissions, in tons, generated by truck loading operations identified in this permit, determined in accordance with f)(1)c.;

d. the rolling, 12-month summation of VOC emissions, in tons, generated by truck loading operations identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by all emissions units at this facility:

current month facility-wide tons of VOC emissions + previous 11-months facility-wide tons of VOC emissions = total 12-month facility-wide tons of VOC emissions

(2) The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

a. The permittee shall record the following information each day:

i. all periods during which there was no pilot flame; and

ii. the operating times for the flare, monitoring equipment, and the associated emissions unit.

(3) Air Toxic Emission Requirements

a. The permit to install for this emissions unit (J001) was evaluated based on the actual materials (typically gasoline, distillates and fuel ethanol) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant:	N-butane
TLV micrograms per cubic meter (μg/m^3):	1,902,000
Maximum Hourly Emission Rate (lbs/hr):	7.986
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	1,150
MAGLC (μg/m^3):	45,286

Pollutant:	Heptane,isomers of
TLV micrograms per cubic meter (µg/m^3):	1,640,000
Maximum Hourly Emission Rate (pounds/hr):	1.090
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	157
MAGLC (µg/m^3):	39,048

Pollutant:	Pentane, isomers of
TLV micrograms per cubic meter (µg/m^3):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	8.568
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	1,234
MAGLC (µg/m^3):	42,167

Pollutant:	N-pentane
TLV micrograms per cubic meter (µg/m^3):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	2.737
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	394
MAGLC (µg/m^3):	42,167

Pollutant:	Hexane, isomers of
TLV micrograms per cubic meter (µg/m^3):	1,762,000
Maximum Hourly Emission Rate (pounds/hr):	1.528
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	220
MAGLC (µg/m^3):	41,952

Pollutant:	N-hexane
TLV micrograms per cubic meter (µg/m^3):	176,000
Maximum Hourly Emission Rate (pounds/hr):	0.5371
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	77
MAGLC (µg/m^3):	4,190

Pollutant:	Toluene
TLV micrograms per cubic meter (µg/m^3):	188,000
Maximum Hourly Emission Rate (pounds/hr):	0.5307
Predicted 1-Hr Max Ground-Level Concentration (µg/m^3):	76.5
MAGLC (µg/m^3):	4,476

Pollutant:	Ethanol
TLV micrograms per cubic meter (μg/m^3):	1,884,000
Maximum Hourly Emission Rate (pounds/hr):	30.37
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	4,375
MAGLC (μg/m^3):	44,857

b. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

iii. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency (Ohio EPA). All records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month restrictions on the throughputs of gasoline, distillates and fuel ethanol;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by the truck loading operations identified in this permit;

iii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

iv. all periods during which the pilot flame was not functioning properly.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

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

a. Emission Limitations:
31.97 lbs/hr VOC emissions

Applicable Compliance Method:
A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

VOC Emissions = 0.222 lb VOC/1000 gal * 108,000 gal/hr ≤ 31.97 lbs/hr VOC

b. Emission Limitations:
0.160 lb of VOC/1,000 gallons when loading gasoline RVP 9 into delivery vessels
0.222 lb of VOC/1,000 gallons when loading gasoline RVP 13.5 into delivery vessels
0.209 lb of VOC/1,000 gallons when loading gasoline RVP 15 into delivery vessels
0.00424 lb of VOC/1,000 gallons when loading distillates into delivery vessels
0.0231 lb of VOC/1,000 gallons when loading fuel ethanol into delivery vessels

Applicable Compliance Method:
To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in b)(1)a., the permittee shall use the following emission factors:

The VOC emissions from gasoline and distillates material loading shall be determined using USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 5.2, Equation 5.2-1 (1/95).

The emission factors shall represent the controlled emission rate using a control efficiency of 98% by weight for VOC emissions for the flare.

c. Emission Limitations:
18.90 tons VOC per year as a rolling, 12-month summation for the truck loading operations identified in this permit,

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
Compliance shall be determined by maintaining monthly and rolling, 12-month records of the amount of throughput for each material processed in accordance with d)(1). Emissions shall be calculated by multiplying the controlled emission factors cited above in f)(1)b. by the rolling, 12-month summation of the throughput for each material processed and dividing by 2000 lbs/ton. Total emissions shall be the sum of the emissions for each material processed. The calculations shall be performed at the beginning of each month and shall cover the previous 12-month period.

(Volume throughput total 12 month gallons of product) * (applicable emission factor {RVP specific for gasoline} in pounds per 1000 gallons) ÷ (2000 pounds per ton) = Air emissions total 12 month tons of emission.

(2) Compliance via emission stack test:

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 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of VOCs.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate of VOCs:

Method 2A of 40 CFR Part 60, Appendix A

Method 21 of 40 CFR Part 60, Appendix A

Method 25B of 40 CFR Part 60, Appendix A

Method 205 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland DAQ. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

f. Personnel from the Cleveland DAQ 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.

g. 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 Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) Miscellaneous Requirements

(1) None.

2. J002, Main Loading Rack

Operations, Property and/or Equipment Description:

Main Loading Rack consisting of fourteen bottom loading arms in four bays loading gasoline, distillates (K-1 kerosene, Jet A kerosene, low and high sulfur diesel fuel or distillate fuel oil number 2) and fuel ethanol into delivery vessels and equipped with a flare.

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)(3)

(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., c)(1), c)(5), d)(1), e)(2), f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-03948 issued 1/16/03	63.94 lbs/hr of Volatile Organic Compound (VOC) emissions Gasoline loading: 0.160 lb of VOC/1,000 gallons when loading gasoline RVP 9 (RVP = Reid vapor pressure, in pounds per square inch) into delivery vessels; 0.222 lb of VOC/1,000 gallons when loading gasoline RVP 13.5 into delivery vessels; and 0.209 lb of VOC/1,000 gallons when loading gasoline RVP 15 into delivery vessels

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Distillate loading: 0.00424 lb of VOC/1,000 gallons when loading distillates into delivery vessels Fuel ethanol loading: 0.0231 lb of VOC/1,000 gallons when loading fuel ethanol into delivery vessels See b)(2)a. below.
b.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from truck loading operations identified in this permit (J001, J002 and J003) shall not exceed 18.90 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility.
c.	40 CFR 63 Subpart R	See b)(2)b. below.
d.	40 CFR 60 Subpart XX	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(Q)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. This emissions unit (J002) shall be equipped with a vapor collection system whereby during the transfer of product to any delivery vessel:

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

ii. all vapors collected by the vapor collection system are vented to the vapor control system;

iii. a means shall be provided to prevent drainage of product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected; and

iv. all product loading lines and vapor lines shall be equipped with fittings that are vapor tight.

b. This emissions unit (J002) is not subject to 40 CFR 63 Subpart R because this facility is not a major source of HAPs.

c) Operational Restrictions

(1) Compliance with the combined emission limitations as stated in b)(1)b. for emissions units J001, J002 and J003 shall be achieved by restricting the annual throughput of gasoline, distillates, and fuel ethanol. The annual throughput of gasoline, distillates, and fuel ethanol, shall not exceed 145,000,000 gallons, 181,000,000 gallons and 210,000,000 gallons, respectively, based on a rolling, 12-month summation of the throughput for each material.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing fuel throughput and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

(2) The Reid Vapor Pressure (RVP) of gasoline loaded at emissions unit J002 shall meet the requirements of 40 CFR 80.27, the "Federal RVP Standard."

(3) Compliance with the annual volume throughput in gallons shall be based upon the rolling, 12-month summations of the monthly volume throughput in gallons.

(4) A pilot flame shall be maintained at all times in the flare's pilot light burner when this emissions unit is in operation.

(5) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs, emission rates, and the emission control efficiency by weight of the flare to calculate monthly actual VOC emissions generated by the facility.

(6) Compliance with the annual emission rate in tons shall be based upon the rolling, 12-month summations of the monthly emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following monthly emission information for this emissions unit and all other truck loading operations:

a. the total individual throughputs of gasoline, distillates and fuel ethanol at this emissions unit for each month, in gallons;

b. the rolling, 12-month summations of the total gasoline, distillates and fuel ethanol throughputs at this emissions unit, in gallons:

current month gallons of throughput + previous 11-months gallons of throughput = total 12-month gallons of throughput;

c. the total VOC emissions, in tons, generated by truck loading operations identified in this permit, determined in accordance with f)(1)c.;

d. the rolling, 12-month summation of VOC emissions, in tons, generated by truck loading operations identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by all emissions units at this facility:

current month facility-wide tons of VOC emissions + previous 11-months facility-wide tons of VOC emissions = total 12-month facility-wide tons of VOC emissions

(2) The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

a. The permittee shall record the following information each day:

i. all periods during which there was no pilot flame; and

ii. the operating times for the flare, monitoring equipment, and the associated emissions unit.

(3) Air Toxic Emission Requirements

a. The permit to install for this emissions unit (J001) was evaluated based on the actual materials (typically gasoline, distillates and fuel ethanol) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant:	N-butane
TLV micrograms per cubic meter ($\mu g/m^3$):	1,902,000
Maximum Hourly Emission Rate (lbs/hr):	15.97
Predicted 1-Hr Max Ground-Level Concentration ($\mu g/m^3$):	15.76
MAGLC ($\mu g/m^3$):	45,286

Pollutant:	Heptane,isomers of
TLV micrograms per cubic meter (μg/m^3):	1,640,000
Maximum Hourly Emission Rate (pounds/hr):	2.18
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	2.15
MAGLC (μg/m^3):	39,048

Pollutant:	Pentane, isomers of
TLV micrograms per cubic meter (μg/m^3):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	17.14
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	16.91
MAGLC (μg/m^3):	42,167

Pollutant:	N-pentane
TLV micrograms per cubic meter (μg/m^3):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	5.47
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	5.40
MAGLC (μg/m^3):	42,167

Pollutant:	Hexane, isomers of
TLV micrograms per cubic meter (μg/m^3):	1,762,000
Maximum Hourly Emission Rate (pounds/hr):	3.06
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	3.017
MAGLC (μg/m^3):	41,952

Pollutant:	N-hexane
TLV micrograms per cubic meter (μg/m^3):	176,000
Maximum Hourly Emission Rate (pounds/hr):	1.074
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	1.06
MAGLC (μg/m^3):	4,190

Pollutant:	Toluene
TLV micrograms per cubic meter (μg/m^3):	188,000
Maximum Hourly Emission Rate (pounds/hr):	1.061
Predicted 1-Hr Max Ground-Level Concentration (μg/m^3):	1.05
MAGLC (μg/m^3):	4,476

Pollutant:	Ethanol
TLV micrograms per cubic meter ($\mu g/m^3$):	1,884,000
Maximum Hourly Emission Rate (pounds/hr):	7.653
Predicted 1-Hr Max Ground-Level Concentration ($\mu g/m^3$):	59.95
MAGLC ($\mu g/m^3$):	44,857

b. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

iii. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency (Ohio EPA). All records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month restrictions on the throughputs of gasoline, distillates and fuel ethanol;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by the truck loading operations identified in this permit;

iii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

iv. all periods during which the pilot flame was not functioning properly.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

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

a. Emission Limitations:
63.94 lbs/hr VOC emissions

Applicable Compliance Method:
A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

VOC Emissions = 0.222 lb VOC/1000 gal * 288,000 gal/hr = 63.94 lbs/hr

b. Emission Limitations:
0.160 lb of VOC/1,000 gallons when loading gasoline RVP 9 into delivery vessels
0.222 lb of VOC/1,000 gallons when loading gasoline RVP 13.5 into delivery vessels
0.209 lb of VOC/1,000 gallons when loading gasoline RVP 15 into delivery vessels
0.00424 lb of VOC/1,000 gallons when loading distillates into delivery vessels
0.0231 lb of VOC/1,000 gallons when loading fuel ethanol into delivery vessels

Applicable Compliance Method:
To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in b)(1)a., the permittee shall use the following emission factors:

The VOC emissions from gasoline and distillates material loading shall be determined using USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 5.2, Equation 5.2-1 (1/95).

The emission factors shall represent the controlled emission rate using a control efficiency of 98% by weight for VOC emissions for the flare.

c. Emission Limitations:
18.90 tons VOC per year as a rolling, 12-month summation for the truck loading operations identified in this permit,

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
Compliance shall be determined by maintaining monthly and rolling, 12-month records of the amount of throughput for each material processed in accordance with d)(1). Emissions shall be calculated by multiplying the controlled emission factors cited above in f)(1)b. by the rolling, 12-month summation of the throughput for each material processed and dividing by 2000 lbs/ton. Total emissions shall be the sum of the emissions for each material processed. The calculations shall be performed at the beginning of each month and shall cover the previous 12-month period.

(Volume throughput total 12 month gallons of product) * (applicable emission factor {RVP specific for gasoline} in pounds per 1000 gallons) ÷ (2000 pounds per ton) = Air emissions total 12 month tons of emissions

(2) Compliance via emission stack test:

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 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of VOCs.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate of VOCs:

Method 2A of 40 CFR Part 60, Appendix A

Method 21 of 40 CFR Part 60, Appendix A

Method 25B of 40 CFR Part 60, Appendix A

Method 205 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland DAQ. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

f. Personnel from the Cleveland DAQ 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.

g. 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 Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) Miscellaneous Requirements

(1) None.

3. J003, Specialty Loading Rack

Operations, Property and/or Equipment Description:

Specialty Loading Rack consisting of 3 fully submerged top loading arms for loading distillates (K-1 kerosene, Jet A kerosene, low and high sulfur diesel fuel or distillate fuel oil number 2) into delivery vessels.

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., c)(1), c(3), d)(1), e)(2), f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-03948 issued 1/16/03	5.35 lbs/hr of Volatile Organic Compound (VOC) emissions Distillates loading: 0.223 lb of VOC/1,000 gallons when loading distillates into delivery vessels
b.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from truck loading operations identified in this permit (J001, J002 and J003) shall not exceed 18.90 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(Q)	See b)(2)a. below.
d.	40 CFR 60 Subpart XX	See b)(2)a. below.
e.	40 CFR 60 Subpart R	See b)(2)b. below.

(2) Additional Terms and Conditions

a. This emissions unit (J003) is not subject to OAC rule 3745-21-09(Q) and 40 CFR 60 Subpart XX because J003 does not process gasoline.

b. This emissions unit (J003) is not subject to 40 CFR 63 Subpart R because this facility is not a major source of HAPs.

c) Operational Restrictions

(1) Compliance with the combined emission limitations as stated in b)(1)b. for emissions units J001, J002 and J003 shall be achieved by restricting the annual throughput of distillates. The annual throughput of distillates shall not exceed 181,000,000 gallons, based on a rolling, 12-month summation of the throughput for each material.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing fuel throughput and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

(2) Compliance with the annual volume throughput in gallons shall be based upon the rolling, 12-month summations of the monthly volume throughput in gallons.

(3) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs, emission rates, and the emission control efficiency by weight of the flare to calculate monthly actual VOC emissions generated by the facility.

(4) Compliance with the annual emission rate in tons shall be based upon the rolling, 12-month summations of the monthly emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following monthly emission information for this emissions unit and all other truck loading operations:

a. the total individual throughputs of gasoline, distillates and fuel ethanol at this emissions unit for each month, in gallons;

b. the rolling, 12-month summations of the total gasoline, distillates and fuel ethanol throughputs at this emissions unit, in gallons;

current month gallons of throughput + previous 11-months gallons of throughput = total 12-month gallons of throughput;

c. the total VOC emissions, in tons, generated by truck loading operations identified in this permit, determined in accordance with f)(1)c.;

d. the rolling, 12-month summation of VOC emissions, in tons, generated by truck loading operations identified in this permit;

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by all emissions units at this facility:

current month facility-wide tons of VOC emissions + previous 11-months facility-wide tons of VOC emissions = total 12-month facility-wide tons of VOC emissions

(2) All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency (Ohio EPA). All records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month restrictions on the throughputs of gasoline, distillates and fuel ethanol;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by the truck loading operations identified in this permit;

iii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

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

a. <u>Emission Limitations:</u>
5.35 lbs/hr VOC emissions

<u>Applicable Compliance Method</u>:
A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

VOC Emissions = 0.223 lb VOC/1000 gal * 24,000 gal/hr = 5.35 lbs/hr VOC

b. <u>Emission Limitations:</u>
0.223 lb of VOC/1,000 gallons when loading distillates into delivery vessels

<u>Applicable Compliance Method:</u>
To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in b)(1)a., the permittee shall use the following emission factors:

The VOC emissions from distillates loading shall be determined using USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 5.2, Equation 5.2-1 (1/95).

c. Emission Limitations:
18.90 tons VOC per year as a rolling, 12-month summation for the truck loading operations identified in this permit,

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
Compliance shall be determined by maintaining monthly and rolling, 12-month records of the amount of throughput for each material processed in accordance with d)(1). Emissions shall be calculated by multiplying the emission factors cited above in f)(1)b. by the rolling, 12-month summation of the throughput for each material processed and dividing by 2000 lbs/ton. Total emissions shall be the sum of the emissions for each material processed. The calculations shall be performed at the beginning of each month and shall cover the previous 12-month period.

(Volume throughput total 12 month gallons of product) * (applicable emission factor {RVP specific for gasoline} in pounds per 1000 gallons) ÷ (2000 pounds per ton) = Air emissions total 12 month tons of emissions

g) Miscellaneous Requirements

(1) None.

4. P002, Barge Loading

Operations, Property and/or Equipment Description:

lake barge loading operation consisting of two fully submerged fill tubes loading gasoline, distillates, (K-1 kerosene, Jet A kerosene, low and high sulfur diesel fuel or distillate fuel oil number 2), and ethanol into barges

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)(2)

(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., c)(1), c)(2), c)(5), d)(1), d)(2), e)(2), f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-03948 issued 1/16/03	333.60 lbs/hr of Volatile Organic Compound (VOC) emissions Gasoline loading: 3.99 lbs of VOC/1,000 gallons when loading gasoline RVP 9 (RVP = Reid vapor pressure, in pounds per square inch) into barge; 5.56 lbs of VOC/1,000 gallons when loading gasoline RVP 13.5 into barge; 5.22 lbs of VOC/1,000 gallons when loading gasoline RVP 15 into barge; and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Distillates loading: 0.11 lb of VOC/1,000 gallons when loading distillates into barge Fuel ethanol loading: 0.46 lb of VOC/1,000 gallons when loading fuel ethanol into delivery vessels
b.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid TV permit	VOC emissions for this emissions unit shall not exceed 34.25 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility.
c.	OAC rule 3745-21-09(Q)	See b)(2)a. below.
d.	40 CFR 60 Subpart XX	See b)(2)a. below.
e.	40 CFR 63 Subpart R	See b)(2)b. below.
f.	40 CFR 63 Subpart Y	See c)(1) below.

(2) Additional Terms and Conditions

a. This emissions unit (P002) is not subject to OAC rule 3745-21-09(Q) and 40 CFR 60 Subpart XX because they do not apply to barge loading.

b. This emissions unit (P002) is not subject to 40 CFR 63 Subpart R because this facility is not a major source of HAPs.

c) Operational Restrictions

(1) The discharge point of a cargo tank filling line must be no higher above the bottom of the cargo tank or sump than 10 cm (approx. 4 inches) or the radius of the filling line, whichever is greater.

(2) The Reid Vapor Pressure (RVP) of gasoline loaded at emissions unit P002 shall meet the requirements of 40 CFR 80.27, the "Federal RVP Standard."

(3) Top submerged filling, as defined in OAC rule 3745-21-01(H)(13), shall be employed for all product loading at this emissions unit.

(4) During the period from April 1 to October 31, gasoline loading is limited to night time (from 6:00 P.M. to 6:00 A.M.). The unfinished gasoline loading continuing into the following day time will be stopped if the ambient air ozone level exceeds the Air Quality Index (AQI) of 80 (or 0.076 ppm ozone or 0.149 mg/m^3 ozone) at the nearest ozone AQI index monitor; and no benzene service, as defined in 40 CFR 61, will be allowed. This ambient ozone level is subject to the future ambient ozone standard when promulgated.

(5) Compliance with the annual VOC emission rate for this emissions unit shall be based upon the rolling, 12-month summations of the monthly emission rate in tons, calculated as follows:

$$\left(\frac{V*3.99\ lbsVOC}{1000\ gallons} + \frac{W*5.56\ lbsVOC}{1000\ gallons} + \frac{X*5.22\ lbsVOC}{1000\ gallons} + \frac{Y*0.11\ lbVOC}{1000\ gallons} + \frac{Z*0.46\ lbVOC}{1000\ gallons}\right) * \frac{ton}{2000\ pounds} \leq 34.25\ \text{TPY}$$

Where: V = amount in gal/yr as a 12-month rolling summation of gasoline at RVP 9;
W = amount in gal/yr as a 12-month rolling summation of gasoline at RVP 13.5;
X = amount in gal/yr as a 12-month rolling summation of gasoline at RVP 15;
Y = amount in gal/yr as a 12-month rolling summation of distillates; and
Z = amount in gal/yr as a 12-month rolling summation of ethanol*

*[Emission factor based on AP-42 (5th addition) -Table 5.2-3]

d) Monitoring and/or Recordkeeping Requirements

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

a. the total individual throughputs of gasoline, distillates and fuel ethanol at this emissions unit for each month, in gallons;

b. the rolling, 12-month summation of the total gasoline, distillates and fuel ethanol throughputs at this emissions unit, in gallons:

current month gallons of throughput + previous 11-months gallons of throughput = total 12-month gallons of throughput;

c. the total VOC emissions, in tons, generated by barge loading operations determined in accordance with f)(1)c.;

d. the rolling, 12-month summation of VOC emissions, in tons, generated by barge loading operations:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by all emissions units at this facility:

current month facility-wide tons of VOC emissions + previous 11-months facility-wide tons of VOC emissions = total 12-month facility-wide tons of VOC emissions.

(2) The permittee shall maintain monthly records of the following information for P002:

a. the individual throughputs, in gallons, of each liquid that has a vapor pressure at standard conditions of 1.5 psia or greater;

b. the rolling, 12-month summation of the total throughputs, in gallons, of the liquids with a vapor pressure at standard conditions of 1.5 psia or greater:

current month gallons of throughput + previous 11-months gallons of throughput = total 12-month gallons of throughput;

c. the total HAP emissions, in tons, generated by the loading of liquids with a vapor pressure at standard conditions of 1.5 psia or greater (the combined HAP concentration of the fuels loaded is approximately 5.8% by weight [or 0.0585 lb/lb VOC]); and

d. the rolling, 12-month summation of HAP emissions, in tons, generated by the loading of liquids with a vapor pressure at standard conditions of 1.5 psia or greater:

current month tons of HAP emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions.

These records shall be retained on the premises for a minimum of five years.

(3) Air Toxic Emission Requirements

a. The permit to install for this emissions unit (P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant:	N-butane
TLV micrograms per cubic meter ($\mu g/m^3$):	1,902,000
Maximum Hourly Emission Rate (pounds/hr):	83.33
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	5,097
MAGLC ($\mu g/m^3$):	45,286

Pollutant:	Heptane,isomers of
TLV micrograms per cubic meter ($\mu g/m^3$):	1,640,000
Maximum Hourly Emission Rate (pounds/hr):	11.38

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	696
MAGLC ($\mu g/m^3$):	39,048
Pollutant:	Pentane, isomers of
TLV micrograms per cubic meter ($\mu g/m^3$):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	89.40
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	5,468
MAGLC ($\mu g/m^3$):	42,167
Pollutant:	N-pentane
TLV micrograms per cubic meter ($\mu g/m^3$):	1,771,000
Maximum Hourly Emission Rate (pounds/hr):	28.56
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	1,747
MAGLC ($\mu g/m^3$):	42,167
Pollutant:	Hexane, isomers of
TLV micrograms per cubic meter ($\mu g/m^3$):	1,762,000
Maximum Hourly Emission Rate (pounds/hr):	15.95
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	975
MAGLC ($\mu g/m^3$):	41,952
Pollutant:	N-hexane
TLV micrograms per cubic meter ($\mu g/m^3$):	176,000
Maximum Hourly Emission Rate (pounds/hr):	5.604
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	342.8
MAGLC ($\mu g/m^3$):	4,190
Pollutant:	Toluene
TLV micrograms per cubic meter ($\mu g/m^3$):	188,000
Maximum Hourly Emission Rate (pounds/hr):	5.538
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$):	338.7
MAGLC ($\mu g/m^3$):	4,476
Pollutant:	Ethanol
TLV micrograms per cubic meter ($\mu g/m^3$):	1,884,000

Maximum Hourly Emission Rate (pounds/hr):	27.6
Predicted 1-Hr Maximum Ground-Level Concentration ($\mu g/m^3$):	1,687.5
MAGLC ($\mu g/m^3$):	44,857

b. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

iii. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) All records including any supporting information, analyses and computations required by this permit to install shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the barge loading operation identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. <u>Emission Limitations:</u>
333.60 lbs/hr VOC emissions

<u>Compliance Method:</u>

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation:

VOC Emissions 5.56 lbs VOC/1000 gal * 60,000 gal/hr = 333.6 lbs/hr VOC

b. Emission Limitations:
3.99 lbs of VOC/1,000 gallons when loading gasoline RVP 9 into barges;
5.56 lbs of VOC/1,000 gallons when loading gasoline RVP 13.5 into barges;
5.22 lbs of VOC/1,000 gallons when loading gasoline RVP 15 into barges; and
0.11 lb of VOC/1,000 gallons when loading distillates into barges
0.57 lb of VOC/1,000 gallons when loading fuel ethanol into barges

Applicable Compliance Method:
To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in b)(1)a., the permittee shall use the following emission factors:

i. The VOC emissions from gasoline and distillates material loading shall be determined using USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 5.2, Equation 5.2-1 (1/95).

c. Emission Limitations:
34.25 tons VOC per year as a rolling, 12-month summation for barge loading operations

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
Compliance shall be determined by maintaining monthly and rolling, 12-month records of the amount of throughput for each material processed in accordance with d)(1). Emissions shall be calculated by multiplying the emission factors cited above in f)(1)b. by the rolling, 12-month summation of the throughput for each material processed and dividing by 2000 lbs/ton. Total emissions shall be the sum of the emissions for each material processed. The calculations shall be performed at the beginning of each month and shall cover the previous 12-month period.

d. (Volume throughput total 12 month gallons of product) * (applicable emission factor {RVP specific for gasoline} in pounds per 1000 gallons) ÷ (2000 pounds per ton) = Air emissions total 12 month tons of emissions.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -T1: T001,T002,

EU ID	Operations, Property and/or Equipment Description
T001	3,551,058 gallon fixed roof distillates tank 1
T002	909,342 gallon fixed roof distillates tank 2

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

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

a. None.

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

a. b)(1)c., c)(1), d)(2), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit.
b.	OAC rule 3745-21-09(L)	See b)(2)a. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility.See b)(2)b. below.

(2) Additional Terms and Conditions

a. This emissions unit is prohibited from storing any petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), with a true vapor pressure greater than 1.52 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any petroleum liquids with a vapor pressure greater than 1.52 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-09(L).

b. Storage tanks identified in this permit as emissions unit numbers T001, T002, T003, T004, T005, T006, and T007 are inherently restricted by the throughput, in gallons, of the material processed by emissions unit J001. Emissions unit J001 has federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information when this emissions unit is in operation:

a. the type of petroleum liquids and/or VOC materials stored in the tank; and

b. the maximum true vapor pressure (in psia), as stored, of each liquid that has a maximum true vapor pressure of 1.0 psia or greater.

(2) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit in accordance with f)(1)a.;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(3) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

(4) The permittee must include in the annual PER any period in which any petroleum liquid material with vapor pressure greater than 1.0 psia was stored.

f) Testing Requirements

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

a. Emission Limitation:
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(2):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -T2: T003,T004,T007,

EU ID	Operations, Property and/or Equipment Description
T003	940,000 gallon internal floating roof gasoline tank 3
T004	1,486,000 gallon internal floating roof gasoline tank 4
T007	1,000,000 gallon internal floating roof gasoline tank 7

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

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

a. None.

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

a. b)(1)c., c)(1), d)(1), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit. Use of an interior floating roof.
b.	OAC rule 3745-21-09(L)	See b)(2)a. and b)(2)b. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)c. below.

(2) Additional Terms and Conditions

a. The automatic bleeder vent shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

b. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

c. Storage tanks identified in this permit as emissions unit numbers T001, T002, T003, T004, T005, T006 and T007 are inherently restricted by the throughput, in gallons, of the material processed by emissions unit J001. Emissions unit J001 has federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit in accordance with f)(1)a.;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions;

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions.

(2) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. Emission Limitation:
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(1):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -T3: T005,T006,

EU ID	Operations, Property and/or Equipment Description
T005	30,000 gallon horizontal cylindrical fuel ethanol tank 5
T006	30,000 gallon horizontal cylindrical fuel ethanol tank 6

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

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

a. None.

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

a. b)(1)c., c)(1), d)(1), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit. Use of an interior floating roof.
b.	OAC rule 3745-21-09(L)	See b)(2)a. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)b. below.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-09(L), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

b. Storage tanks identified in this permit as emissions unit numbers T001, T002, T003, T004, T005, T006 and T007 are inherently restricted by the throughput, in gallons, of the material processed by emissions unit J001. Emissions unit J001 has federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit in accordance with f)(1)a.;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(2) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. Emission Limitation:
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(1):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -T4: T012,T016,T020,T021,T022,T023,

EU ID	Operations, Property and/or Equipment Description
T012	2,822,232 gallon fixed roof distillates tank 18119
T016	4,064,508 gallon fixed roof distillates tank #18123
T020	99,120 gallon fixed roof distillates tank 18191
T021	154,728 gallon fixed roof distillates tank 18192
T022	222,474 gallon fixed roof distillates tank 18193
T023	222,474 gallon fixed roof distillates tank 18194

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

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

a. None.

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

a. b)(1)c., c)(1), d)(2), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit.
b.	OAC rule 3745-21-09(L)	See b)(2)a. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)b. below.

(2) Additional Terms and Conditions

a. This emissions unit is prohibited from storing any petroleum liquids, as defined in OAC rule 3745-21-01(E)(13), with a true vapor pressure greater than 1.52 pounds per square inch absolute (psia) under actual storage conditions. Should the permittee wish to store any petroleum liquids with a vapor pressure greater than 1.52 psia at actual storage conditions in this emissions unit, modifications would need to be made to this storage tank to comply with OAC rule 3745-21-09(L).

b. Storage tanks identified in this permit as emissions unit numbers T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, T024, T025, T034, T035, T036, T037, T038, T039, T054, T055 and T056 are inherently restricted by the throughput, in gallons, of the material processed by emissions units J002, J003 and P002. Emissions units J002, J003 and P002 have federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information when this emissions unit is in operation:

a. the type of petroleum liquids and/or VOC materials stored in the tank; and

b. the maximum true vapor pressure (in psia), as stored, of each liquid that has a maximum true vapor pressure of 1.0 psia or greater.

(2) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(3) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

(4) The permittee must include in the annual PER any period in which any petroleum liquid material with vapor pressure greater than 1.0 psia was stored.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

<u>Applicable Compliance Method:</u>
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(2):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -T5: T013,T014,T015,

EU ID	Operations, Property and/or Equipment Description
T013	2,822,232 gallon internal floating roof gasoline tank 18120
T014	2,822,484 gallon internal floating roof fuel ethanol tank 18121
T015	2,734,410 gallon internal floating roof fuel ethanol tank 18122

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

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

a. None.

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

a. b)(1)c., c)(1), d(1), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit. Use of an internal floating roof.
b.	OAC rule 3745-21-09(L)	See b)(2)a. and b)(2)b. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)c. below.
d.	40 CFR 60 Subpart Kb	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. The automatic bleeder vent shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

b. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

c. Storage tanks identified in this permit as emissions unit numbers T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, T024, T025, T034, T035, T036, T037, T038, T039, T054, T055 and T056 are inherently restricted by the throughput, in gallons, of the material processed by emissions units J002, J003 and P002. Emissions units J002, J003 and P002 have federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(2) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

<u>Applicable Compliance Method:</u>
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(1):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -T6: T017,T018,T019,T024,T025,

EU ID	Operations, Property and/or Equipment Description
T017	984,186 gallon internal floating roof gasoline tank 18124
T018	705,642 gallon internal floating roof gasoline tank 18125
T019	99,120 gallon internal floating roof fuel ethanol tank 18190
T024	modification by conversion of the 499,800 gallon capacity fixed roof storage tank into an internal floating roof storage tank to store gasoline, ethanol and distillate fuel oil
T025	modification by conversion of the 430,626 gallon capacity fixed roof storage tank into an internal floating roof storage tank to store gasoline, ethanol and distillate fuel oil

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

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

a. None.

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

a. b)(1)c., c)(1), d)(1), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit. Use of an internal floating roof.
b.	OAC rule 3745-21-09(L)	See b)(2)a. and b)(2)b. below.
c.	OAC rule 3745-31-05(D)(1)(b)	VOC emissions from storage tanks

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	FEPTIO to avoid Title V permit	identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling, 12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)c. below.

(2) Additional Terms and Conditions

a. The automatic bleeder vent shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

b. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

c. Storage tanks identified in this permit as emissions unit numbers T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, T024, T025, T034, T035, T036, T037, T038, T039, T054, T055 and T056 are inherently restricted by the throughput, in gallons, of the material processed by emissions units J002, J003 and P002. Emissions units J002, J003 and P002 have federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(2) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. Emission Limitation:
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(1):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group -T7: T034,T035,T036,T037,T038,T039,

EU ID	Operations, Property and/or Equipment Description
T034	17,010 gallon fixed roof distillates tank 25414
T035	17,010 gallon fixed roof distillates tank 25415
T036	17,010 gallon fixed roof distillates tank 25416
T037	17,010 gallon fixed roof distillates tank 25417
T038	17,010 gallon fixed roof distillates tank 25418
T039	17,010 gallon fixed roof distillates tank 25419

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

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

a. None.

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

a. b)(1)c., c)(1), d)(1), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit.
b.	OAC rule 3745-21-09(L)	See b)(2)a. below.
c.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month summation. 91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)b. below.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-09(L), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity less than 40,000 gallons.

b. Storage tanks identified in this permit as emissions unit numbers T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, T024, T025, T034, T035, T036, T037, T038, T039, T054, T055 and T056 are inherently restricted by the throughput, in gallons, of the material processed by emissions units J002, J003 and P002. Emissions units J002, J003 and P002 have federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(2) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

f) Testing Requirements

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

a. Emission Limitation:
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

Applicable Compliance Method:
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(1):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group -T8: T054,T055,T056,

EU ID	Operations, Property and/or Equipment Description
T054	21,000 gallon horizontal cylindrical distillates tank 18196
T055	21,000 gallon horizontal cylindrical distillates tank 4001
T056	21,000 gallon horizontal cylindrical transmix (interface) tank 4002

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

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

a. None.

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

a. b)(1)c., c)(1), d)(2), e)(2), f)(1)

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) PTI 13-03948 issued 1/16/03	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(L). Use of submerged fill when loading this emissions unit.
b.	OAC rule 3745-21-09(L)	See b)(2)a. below.
c.	40 CFR 60 Subpart Kb	See b)(2)b. below.
d.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V permit	VOC emissions from storage tanks identified in this permit shall not exceed 36.03 tons per year (TPY) as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility. See b)(2)c. below.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-09(L), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity less than 40,000 gallons.

b. This emissions unit is prohibited from storing any volatile organic liquid, as defined in 40 CFR 60.111b, with a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 pounds per square inch (psia)). Should the permittee wish to store any volatile organic liquid with a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 psia) in this emissions unit, modifications would need to be made to this storage tank to comply with 40 CFR 60 Subpart Kb.

c. Storage tanks identified in this permit as emissions unit numbers T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, T024, T025, T034, T035, T036, T037, T038, T039, T054, T055 and T056 are inherently restricted by the throughput, in gallons, of the material processed by emissions units J002, J003 and P002. Emissions units J002, J003 and P002 have federally enforceable permit restrictions to limit the amount of material processed on a rolling, 12-month basis.

c) Operational Restrictions

(1) The permittee shall document the monthly emissions by tracking the monthly VOC emission factors, volume throughputs and emission rates to calculate monthly actual VOC emissions generated by the storage tanks identified in this permit and by the facility.

(2) Compliance with the annual VOC emission rate in tons shall be based upon the rolling, 12-month summations of the monthly VOC emission rate in tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information when this emissions unit is in operation:

a. the type of petroleum liquids and/or VOC materials stored in the tank; and

b. the maximum true vapor pressure (in psia), as stored, of each liquid that has a maximum true vapor pressure of 4.0 psia or greater.

(2) The permittee shall maintain the following monthly emission information for this emissions unit and all other storage tanks:

a. the amount of throughput, in gallons;

b. the total VOC emissions, in tons, generated by storage tanks identified in this permit;

c. the rolling, 12-month summations of VOC emissions, in tons, generated by storage tanks identified in this permit:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

d. the total VOC emissions, in tons, generated by all emissions units at this facility; and

e. the rolling, 12-month summation of VOC emissions, in tons, generated by storage tanks identified in this permit and by all the emissions units at this facility:

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

(3) All records including any supporting information, analyses and computations required by this permit shall be retained on file (on site) for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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:

i. the rolling, 12-month emissions restriction for VOC emissions generated by the storage tanks identified in this permit;

ii. the rolling, 12-month emissions restriction for VOC emissions generated by all emissions units at this facility; and

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 Cleveland Division of Air Quality (Cleveland DAQ).

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

(4) The permittee must include in the annual PER any period in which any volatile organic liquid with vapor pressure greater than 4.0 psia was stored.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
36.03 tons VOC per year as a rolling, 12-month summation for storage tanks identified in this permit

91.16 tons VOC per year as a rolling, 12-month summation for all emissions units at this facility

<u>Applicable Compliance Method:</u>
To calculate VOC for the purpose of determining compliance with the applicable emission limitations in b)(1)c., the permittee shall comply with the following:

VOC emissions from the storage tanks shall be determined using the latest version of the USEPA's TANKS or USEPA reference document AP-42, Fifth Edition or the most recent edition of AP-42, Compilation of Air Pollution Emission Factors, Section 7.1, Organic Liquid Storage Tanks (9/97). Divide the emission rate from TANKS, in pounds, by 2000 lbs/ton to convert to tons. Compliance with the rolling, 12-month limitation shall be done in accordance with the recordkeeping from d)(2):

current month tons of VOC emissions + previous 11-months tons of VOC emissions = total 12-month tons of VOC emissions

g) Miscellaneous Requirements

(1) None.