



Environmental Protection Agency

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

10/18/2012

Steve Clark  
ERGON TRUCKING INC-MARIETTA  
PO BOX 1639  
JACKSON, MS 39215-1639

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

Facility ID: 0684020225  
Permit Number: P0109848  
Permit Type: OAC Chapter 3745-31 Modification  
County: Washington

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or 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](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-SEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ERGON TRUCKING INC-MARIETTA**

Facility ID:	0684020225
Permit Number:	P0109848
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/18/2012
Effective:	10/18/2012
Expiration:	7/14/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
ERGON TRUCKING INC-MARIETTA

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# Authorization

Facility ID: 0684020225  
 Application Number(s): A0043476, A0045519, A0045853  
 Permit Number: P0109848  
 Permit Description: Chapter 31 modification to PTI 06-5586 issued 10/6/99 to increase barge loading volume to accomodate loading light crude oil, increase the throughput of Penn Grade crude oil, and installation and operation of a vapor control unit to control emissions associated with barge loading of both the Penn Grade crude and the light crude oils.  
 Permit Type: OAC Chapter 3745-31 Modification  
 Permit Fee: \$2,250.00  
 Issue Date: 10/18/2012  
 Effective Date: 10/18/2012  
 Expiration Date: 7/14/2021  
 Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ERGON TRUCKING INC-MARIETTA  
STATE RTE 7  
Marietta, OH 45750

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

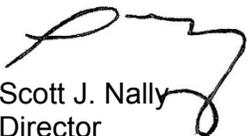
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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: P0109848  
Permit Description: Chapter 31 modification to PTI 06-5586 issued 10/6/99 to increase barge loading volume to accomodate loading light crude oil, increase the throughput of Penn Grade crude oil, and installation and operation of a vapor control unit to control emissions associated with barge loading of both the Penn Grade crude and the light crude oils.

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

<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	Barge Loading
Superseded Permit Number:	06-5586
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	Tank 1
Superseded Permit Number:	06-5586
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	Tank 2
Superseded Permit Number:	06-5586
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a

renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> 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.

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<sup>1</sup>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) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb: T001 and T002. The complete NSPS requirements, including the 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 appropriate Ohio EPA District office or local air agency.

## **C. Emissions Unit Terms and Conditions**



1. J001, Barge Loading

Operations, Property and/or Equipment Description:

Loading Rack - submerged loading of barges with a maximum throughput of 13,505,000 barrels of crude oil per year (567,210,000 gallons per year) and controlled by a thermal oxidizer with 95% capture efficiency and 98% control efficiency of Volatile Organic Compound emissions (Chapter 31 modification to PTI 06-5586 issued 10/6/1999 to increase throughput limits and install a thermal oxidizer).

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: ORC 3704.03(T), Carbon monoxide (CO) emissions shall not exceed 0.37 lb/mmBtu. Row b: OAC rule 3745-31-05(A)(3), as effective 11/30/01, Nitrogen Oxide (NOx) emissions shall not exceed 4.01lbs per hour and 6.42 tons per year, Sulfur Dioxide (SO2) emissions shall not exceed 1.36lbs per hour and 2.18 tons per year, Particulate Emissions (PE) shall not exceed 0.44lb per hour and 0.70 ton per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	b)(2)b. below.
d.	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a six minute average.
e.	OAC rule 3745-17-10(B)(1)	PE from the stack shall not exceed 0.020 lb/mmBtu of actual heat input.  This emissions limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO<sub>2</sub> and NO<sub>x</sub> emissions from this air contaminant source since the uncontrolled potential to emit for PE, SO<sub>2</sub> and NO<sub>x</sub> is less than 10 tons/year.

c) Operational Restrictions

- (1) Volatile Organic Compound (VOC) emissions from this emissions unit shall be vented to a thermal oxidizer with a capture efficiency of 95% and a control efficiency of 98% for VOC emissions. The thermal oxidizer shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

(2) The permittee shall burn only natural gas in this emissions unit.

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

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be less than 50 degrees Fahrenheit from the temperature measured during the most recent compliant stack test. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than 3 years.

(3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;

- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (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:
    - a. each period of time(start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration; and
    - b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer with a capture efficiency of 95% and a control efficiency of 98% for VOC emissions;

- 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 each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) **Testing Requirements**

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

- a. Emissions Limitation:

All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer with a capture efficiency of 95% and a control efficiency of 98% for VOC emissions.

Applicable Compliance Method:

See f)(2) below.

- b. Emissions Limitation:

CO emissions shall not exceed 0.37 lb/mmBtu.

Applicable Compliance Method:

The lbs per mmBtu emissions limitation was based on the emission factor of 0.37 lb per mmBtu (US EPA, AP-42 Chapter 13 Table 13.5-1, 1991).

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

## c. Emissions Limitations:

NO<sub>x</sub> emissions shall not exceed 4.01lbs per hour and 6.42ton per year.

Applicable Compliance Method:

The lbs per hour emissions limitation was established by multiplying the heat input rating of the thermal oxidizer as submitted in the application (59mmBtu/hr) by the emission factor of 0.068 lb per mmBtu (US EPA, AP-42 Chapter 13 Table 13.5-1, 1991).

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by multiplying the lb/hr emissions by the maximum hours of barge loading that could occur taking into account the pump capacity and the movement of barges as submitted in application (3,200 hours/year) and dividing by 2,000 lbs/ton.

Compliance with the annual emissions limitation is assumed if the facility is in compliance with the lbs per hour emissions limitation and the facility does not exceed 3,200 hours/year of barge loading.

## d. Emissions Limitations:

SO<sub>2</sub> emissions shall not exceed 1.36 lb per hour and 2.18 tons per year.

Applicable Compliance Method:

The lb per hour and annual emission limitations was established by the following calculation:

$[13,505,000 \text{ bbl/yr} \times 42 \text{ gal/bbl} \times \text{Mgal}/1,000 \text{ gal} \times 1.54 \text{ lbs./Mgal}] \times 0.005 \text{ lb SO}_2/\text{lb HCV} \times 1 \text{ ton}/2,000 \text{ lbs.} = 2.18 \text{ tons per year of SO}_2 \text{ emissions}$

$2.18 \text{ Tons of SO}_2 \times 2,000 \text{ lb/ton} \times 1 \text{ yr}/3,200 \text{ hr} = 1.36\text{lbs per hour of SO}_2 \text{ emissions}$

Where:

13,505,000bbl/yr = maximum bbl/yr combusted per application.

0.005 lb SO<sub>2</sub>/lb HCV = the expected sulfur content of the product (lb of SO<sub>2</sub> per lb of hydrocarbon vapor) as submitted in application.

1 yr/3,200 hr = maximum hours of barge loading that could occur taking into account the pump capacity and movement of barges.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emissions limitation is assumed if the facility is in compliance with the lbs per hour emissions limitation and the facility does not exceed 3,200 hours/year of barge loading.

e. Emissions Limitations:

PE shall not exceed 0.44lb per hour and 0.70 ton per year.

Applicable Compliance Method:

The lbs per hour emissions limitation was established by multiplying the heat input rating of the thermal oxidizer (59mmBtu/hr) by the emission factor of 0.00745098 lb per mmBtu (UE EPA, AP-42 Chapter 1.4 Table 1.4-2).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by multiplying the lb/hr emissions by the maximum hours of barge loading that could occur taking into account the pump capacity and the movement of barges as submitted in application (3,200 hours/year) and divide by 2,000 lbs/ton.

Compliance with the annual emissions limitation is assumed if the facility is in compliance with the lbs per hour emissions limitation and the facility does not exceed 3,200 hours/year of barge loading.

f. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a six minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

g. Emissions Limitation:

PE from the stack shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60

"Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- (2) 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 3 months after start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC emissions.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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 appropriate Ohio EPA District Office or local air agency. 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
- g) **Miscellaneous Requirements**
- (1) None.



2. Emissions Unit Group -Tanks: T001,T002,

EU ID	Operations, Property and/or Equipment Description
T001	Crude Oil Storage Tank #1 -Internal floating roof, submerged fill, 55,000 barrel (2,310,000 gallons) capacity, 2,190,000 barrels (91,980,000 gallons) of maximum annual throughput (Chapter 31 modification to PTI 06-5586 issued 10/6/1999 to increase throughput limits).
T002	Crude Oil Storage Tank #2 - internal floating roof, submerge fill, 55,000 barrel (2,310,000 gallons) capacity, 2,190,000 barrels (91,980,000 gallons) maximum annual throughput (Chapter 31 modification to PTI 06-5586 issued 10/6/1999 to increase throughput limits).

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	See c)(1) – (3)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 3.09 tons per year.</p> <p>See b)(2)a.-b.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	40 CFR part 60, Subpart Kb (40 CFR 60.110b – 60.117b)	The storage vessel shall be equipped with a fixed roof in combination with an

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 6.110b this emissions unit is a storage vessel with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984]	internal floating roof meeting the specification outlined in 60.112b(a)(1)(i)-(ix).  (60.112b(a)(1)(i)-(ix))  See b)(2)d., b)(2)e. and c)(4)
e.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	General Provisions

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill.
- b. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-105, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.  
  
 The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/yr taking into account the federally enforceable requirements of an internal floating roof and vapor pressure limitation under 40 CFR part 60, Subpart Kb.
- d. Owners or operators may choose to comply with 40 CFR Part 65, Subpart C, to satisfy the requirements of 60.112b through 60.117b for storage vessels that are subject to this subpart that meet the specifications in paragraphs (e)(1)(i) and (ii) of this section. When choosing to comply with 40 CFR Part 65, Subpart C, the monitoring requirements of 60.116b(c), (e), (f)(1) and (g) still apply. Other provisions applying to owners or operators who choose to comply with 40 CFR Part 65 are provided in 40 CFR 65.1.

- e. Owners or operators who choose to comply with 40 CFR Part 65, Subpart C, must also comply with 60.1, 60.2, 60.5, 60.6, 60.7(a)(1) and (4), 60.14, 60.15 and 60.16 for those storage vessels. All sections and paragraphs of Subpart A of this part that are not mentioned in this paragraph (e)(2) do not apply to owners or operators of storage vessels complying with 40 CFR Part 65, Subpart C, except that provisions required to be met prior to implementing 40 CFR Part 65 still apply. Owners and operators who choose to comply with 40 CFR Part 65, Subpart C, must comply with 40 CFR Part 65, Subpart A.

c) Operational Restrictions

- (1) No person shall place, store, or hold in a fixed roof tank any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute after the date specified in paragraph (C)(11) of rule 3745-21-04 of the Administrative Code unless such tank, is designed or equipped as follows, except where exempted under paragraph (L)(2) of this rule:
  - a. Vapor control equipment which is one of the following:
    - i. Internal floating roof; or
    - ii. Alternative equivalent control for VOC emissions as may be approved by the director.
- (2) If equipped with an internal floating roof, the automatic bleeder vents are to 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, are to be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- (3) All openings, except stub drains, are to 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.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(a)(1)(i)-(ix)	Required specifications for fixed roof in combination with an internal floating roof.
60.110b(e)	Alternative Means of Compliance – Option to comply with 40 CFR part 65, subpart C to satisfy the requirements of 60.112b through 60.117b.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(1)	Visual inspection requirements after installing permanently affixed roof and internal floating roof.
60.113b(a)(2)	Visual inspection requirements for vessels equipped with a liquid-mounted or mechanical shoe primary seal.
60.113b(a)(3)(i)-(ii)	Visual inspection requirements for vessels equipped with a double-seal system.
60.113b(4)	Visual inspection required each time storage vessel is emptied and degassed.
60.115b and 60.116b(a)	Report and record retention requirements.
60.115b(a)(2)	Required records of each inspection performed as required by 60.113b (a)(1), (a)(2), (a)(3), and (a)(4).
60.116b(b)	Dimension of storage vessel and capacity records.
60.116b(c)	Required records of VOL stored, period of storage, and max. true vapor pressure.
60.116b(e)(1)-(3)	Means for determining maximum true vapor pressure.
60.116b(f)(1)-(2)	Requirements for vessel storing waste mixture of indeterminate or variable composition.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.115b	Report and record retention requirements.
60.115b(a)(1)	Required certification control equipment report.
60.115b(a)(3) – (4)	Required visual inspection report when defects are detected.
60.113b(a)(5)	Required written notification prior to filling or refilling each storage vessel for which inspection was required by (a)(1) and (a)(4).

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 3.09 tons per year.

Applicable Compliance Method:

Compliance shall be determined by a one-time calculation using the TANKS Program 4.09 or other method acceptable to the Ohio EPA Southeast District Office.

g) Miscellaneous Requirements

- (1) None.