



Environmental Protection Agency

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

10/24/2012

Greg Moore
Marathon Petroleum Company LP
539 S Main Street
Office 6692
Findlay, OH 45840

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0215130176
Permit Number: P0111139
Permit Type: Initial Installation
County: Columbiana

Certified Mail

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

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

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

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Marathon Petroleum Company (MPC) - Wellsville Terminal which is located on 21st Street in Wellsville, OH submitted a permit-to-install and operate (PTIO) application for the installation of a new barge loading operation that can load up to 6,000 barrel per hour of condensate into barges. MPC will install a John Zink marine vapor combustion unit to control loading loss emissions from the barge loading operation. The proposed barge loading operation has a maximum annual throughput of 706,406,000 gallons.

3. Facility Emissions and Attainment Status:

This facility has requested a synthetic minor permit because the maximum potential to emit, at 8760 hours per year, for this emissions unit would make this facility a major source for VOC and will be subject to Title V permitting. Federally enforceable restrictions will lower the VOC potential emissions to less than 100 TPY. These restrictions will keep the company from the requirements of Title V. The facility is located in Columbiana County, an area designated "attainment/unclassifiable" for all NSR-regulated pollutants.

4. Source Emissions:

MPC has requested federally enforceable restriction on the annual barge throughput of 706,406 Mgal/yr. With the proposed throughput limitation the annual VOC emissions will be limited to 36.0.

5. Conclusion:

This facility will have federally enforceable limitations that will keep permit allowable emission below the threshold levels for Title V.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	36.0

PUBLIC NOTICE

10/24/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Marathon Petroleum Company LP

21 NEVADA AVE,

Wellsville, OH 43968

Columbiana County

FACILITY DESC.: Petroleum Bulk Stations and Terminals

PERMIT #: P0111139

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of a new barge loading operation, equipped with a Zink marine vapor combustion unit to control loading loss emissions from the barge loading operation.

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



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Marathon Petroleum Company LP**

Facility ID:	0215130176
Permit Number:	P0111139
Permit Type:	Initial Installation
Issued:	10/24/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Marathon Petroleum Company LP

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Authorization

Facility ID: 0215130176
 Application Number(s): A0045252, A0045673
 Permit Number: P0111139
 Permit Description: Installation of a new barge loading operation, equipped with a Zink marine vapor combustion unit to control loading loss emissions from the barge loading operation.
 Permit Type: Initial Installation
 Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 10/24/2012
 Effective Date: To be entered upon final issuance
 Expiration Date: To be entered upon final issuance
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Marathon Petroleum Company LP
 21 NEVADA AVE
 Wellsville, OH 43968

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
 Director



Authorization (continued)

Permit Number: P0111139

Permit Description: Installation of a new barge loading operation, equipped with a Zink marine vapor combustion unit to control loading loss emissions from the barge loading operation.

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

Emissions Unit ID:	P001
Company Equipment ID:	Barge Loading of Crude/Condensate
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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.

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).

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. P001, Barge Loading of Crude/Condensate

Operations, Property and/or Equipment Description:

Barge loading of crude/condensate mixture, equipped with marine vapor combustor unit

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

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.	ORC 3704.03(T)	Emissions from Combustor: Nitrogen oxides (NO _x) emissions from this emissions unit shall not exceed 0.041 lb/1,000 gal. Carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.09 lb/1,000 gal. See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-31-05(D)(1)(b)	Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 42.1 lbs/hr and 36.0 tpy as a rolling, 12-month summation.



(2) Additional Terms and Conditions

- a. Whenever this emissions unit is in operation, all of the VOC emissions from this emissions unit shall be vented to the marine vapor combustion unit that shall meet the operational, monitoring and record keeping requirements of this permit.
b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(17), is equal to zero.
c. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information in the area source rules, please refer to the following U.S. EPA website:

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

c) Operational Restrictions

- (1) The maximum annual barge throughput rate for this emissions unit shall not exceed 706,406,000 gallons, based upon a rolling, 12-month summation of material throughput.
(2) To ensure enforceability during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall not exceed the maximum throughput levels specified in the following table:

Table with 2 columns: Months(s) and Maximum Allowable Cumulative Condensate Throughput in Gallons. Rows range from 1 to 1-12 months.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the total condensate and crude oil throughput at this emissions unit for each month, in gallons;
 - b. the rolling, 12-month summation of the total condensate and crude oil throughput 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)a; and
 - 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.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the marine vapor combustion unit, during any period of time when the emissions unit controlled by the marine vapor combustion unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance. Until compliance testing has been conducted, the marine vapor combustion unit shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and the operating manual.
- (3) The permittee shall properly install, operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the marine vapor combustion unit when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a once per shift 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.
- (4) Whenever the monitored average combustion temperature within the marine vapor combustion unit 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.

e) 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 emissions restriction for VOC emissions generated by the barge loading operation identified in this permit; and
 - ii. all exceedances of the rolling, 12-month crude/condensate mixture throughput limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative crude/condensate throughput limitation.
- b. 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;
 - c. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the marine vapor combustion unit was not operating;
 - d. each incident of deviation described in e)(1)b or e)(1)c where a prompt investigation was not conducted;
 - e. each incident of deviation described in e)(1)b or e)(1)c where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - f. each incident of deviation described in e)(1)b or e)(1)c where proper records were not maintained for the investigation and/or the corrective action(s).

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 the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (Northeast District Office of Ohio EPA).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-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 section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

VOC emissions from this emissions unit shall not exceed 42.1 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = A*B*(1-C)$$

where:

E = VOC emissions in lbs/hr;

A = maximum barge throughput per hour, 252,000 gallons/hr;

B = calculated maximum loading losses using equation 1 of AP-42, Section 5.2 (version 6/08), 8.3 lbs/1,000 gal; and

C = marine combustor average VOC control efficiency demonstrated from the most recent compliance demonstration stack tests.

b. Emission Limitations:

VOC emissions from this emissions unit shall not exceed 36.0 tpy as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = A*B*(1-C) / 2,000 \text{ lbs/ton}$$

where:

E = annual VOC emissions in tons per year;

A = annual barge throughput based upon the record keeping requirements specified in d)(1)a. of this permit, gallons/yr;

B = calculated maximum loading losses using equation 1 of AP-42, Section 5.2 (version 6/08), 5.0 lbs/1000 gal; and

C = marine combustor average VOC control efficiency demonstrated from the most recent compliance demonstration stack tests.

c. Emission Limitation:

NO_x emissions from this emissions unit shall not exceed 0.041 lb/1,000 gal.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = [(A*B+C*D)]/ F$$

where:

E = NO_x emissions in lbs / 1000 gal;

A = NO_x enclosed flare emission factor, 3.34E-02 lb/1,000 gal (supplied by facility);

B = maximum hourly loading rate of condensate to barge, 252,000 gal/hr;

C = NO_x EF using AP-42 Sec.1.4, Table 1.4-1, 9.80 E-02 lb/MMBtu;
 D = pilot/Enrichment gas heat input capacity, 18.54 MMBtu/hr; and
 F = maximum hourly loading rate of condensate to barge, 252,000 gal/hr.

d. Emission Limitation:

CO emissions from this emissions unit shall not exceed 0.09 lb/1,000 gal.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = [(A*B+C*D)] / F$$

where:

E = CO emissions in lbs / 1000 gal;
 A = CO enclosed flare emission factor, 8.35 E-02 lb/1,000 gal (supplied by facility);
 B = maximum hourly loading rate of condensate to barge, 252,000 gal/hr;
 C = CO EF using AP-42 Sec.1.4, Table 1.4-1, 8.24 E-02 lb/MMBtu;
 D = pilot/Enrichment gas heat input capacity, 18.54 MMBtu/hr; and
 F = maximum hourly loading rate of condensate to barge, 252,000 gal/hr.

- (2) For the purpose of determining the destruction efficiency of the combustor, 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 120 days after the issuance of this permit or after beginning operation whichever date is later.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for VOC and the control efficiency for VOC of the marine vapor combustor unit.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. for VOC: Methods 25 or 25A 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 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.

- e. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. 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 Northeast District Office of Ohio EPA's refusal to accept the results of the emission test(s).
 - g. Personnel from the Northeast District Office of Ohio EPA 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.
 - h. 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 Northeast District Office of Ohio EPA 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 Northeast District Office of Ohio EPA.
- g) Miscellaneous Requirements
- (1) None.