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

2/13/2013

Certified Mail

LARRY BAUER
Citgo Petroleum Corp. - Toledo Terminal
1840 Otter Creek Rd.
Oregon, OH 43616

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	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: 0448010220
Permit Number: P0110209
Permit Type: Renewal
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) 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. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO 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
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: TDES

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Citgo Petroleum Corp. - Toledo Terminal

Facility ID:	0448010220
Permit Number:	P0110209
Permit Type:	Renewal
Issued:	2/13/2013
Effective:	2/13/2013
Expiration:	2/13/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
Citgo Petroleum Corp. - Toledo Terminal

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Authorization

Facility ID:	0448010220
Application Number(s):	A0043221
Permit Number:	P0110209
Permit Description:	FEPTIO Renewal permit for petroleum loading terminal.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	2/13/2013
Effective Date:	2/13/2013
Expiration Date:	2/13/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Citgo Petroleum Corp. - Toledo Terminal
1840 Otter Creek Road
Oregon, OH 43616

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0110209
Permit Description: FEPTIO Renewal permit for petroleum loading terminal.

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:	Loading Rack
Superseded Permit Number:	04-01427
General Permit Category and Type:	Not Applicable

Group Name: EFR > 40,000 gal, 1949-1953

Emissions Unit ID:	**T006**
Company Equipment ID:	Tank 223
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T011**
Company Equipment ID:	Tank 281
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T012**
Company Equipment ID:	Tank 282
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable

Group Name: IFR > 19,812 gal modified > 1984

Emissions Unit ID:	**T014**
Company Equipment ID:	Tank 210
Superseded Permit Number:	04-01427
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T019**
Company Equipment ID:	Tank 218
Superseded Permit Number:	04-01427
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T020**
Company Equipment ID:	Tank 219
Superseded Permit Number:	04-01427
General Permit Category andType:	Not Applicable

Group Name: IFR > 40,000 gal 1936-1954

Emissions Unit ID:	**T001**
Company Equipment ID:	Tank 114
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T002**
Company Equipment ID:	Tank 115
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**T004**
Company Equipment ID:	Tank 217
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T005**
Company Equipment ID:	Tank 222
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T015**
Company Equipment ID:	Tank 283
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T024**
Company Equipment ID:	Tank 236
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T029**
Company Equipment ID:	Tank 244
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T030**
Company Equipment ID:	Tank 245
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T035**
Company Equipment ID:	Tank 209
Superseded Permit Number:	P0088107
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T037**
Company Equipment ID:	Tank 116
Superseded Permit Number:	04-01259
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 Toledo Department of Environmental Services 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) None.

2. 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.

3. Facility-wide restrictions on material throughput established under the authority of OAC rule 3745-31-05(D) in PTI 04-01427 as issued January 26, 2006:

   a) Applicable Emissions Limitations

      (1) The emissions of VOC from all emissions units at this facility shall be restricted to 95.04 tons per year as a rolling, 12-month summation.

      (2) The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be restricted to 9.9 tons per year for any individual HAP, and 24.5 tons per year for any combination of HAPs as rolling, 12-month summations.

   b) Operational Restrictions

      (1) For purposes of compliance with the rolling, 12-month emissions limitations:

         a. the annual distillate throughput for emissions unit J001 shall not exceed 630,700,000 gallons based upon a rolling, 12-month summation of the monthly throughputs;

         b. the annual ethanol throughput for emissions unit J001 shall not exceed 60,000,000 gallons based upon a rolling, 12-month summation of the monthly throughputs;

c. the annual gasoline throughput for emissions unit J001 shall not exceed 109,900,000 gallons based upon a rolling, 12-month summation of the monthly throughputs;

d. the annual distillate throughput of all storage tanks located at this facility on an as received basis shall not exceed 1,177,344,000 gallons based upon a rolling, 12-month summation of the monthly throughputs; and

e. the annual gasoline throughput of all storage tanks located at this facility on an as received basis shall not exceed 1,177,344,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

The permittee shall comply with the rolling, 12-month throughput limitation immediately upon startup under this permit based on past throughput records.

c) Monitoring and/or Recordkeeping Requirements

(1) For purposes of compliance with the rolling, 12-month emissions limitations, the permittee shall maintain monthly records of the following information:

a. the total, individual throughput of emissions unit J001 (loadout) of distillates, ethanol and gasoline (including transmix), in gallons;

b. the rolling, 12-month summations of the loadouts of emissions unit J001 of distillates, ethanol and gasoline, in gallons per year;

c. the total, individual throughput of all storage tanks on an as received basis (receipt) at the facility of distillates and gasoline (including transmix), in gallons;

d. the rolling, 12-month summations of the total receipt at the facility of distillates and gasoline; in gallons per year; and

e. the calculated, monthly total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions from distillates, ethanol, gasoline and all other materials for all emissions units at the facility, in tons per year.

d) 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. for purposes of compliance with the rolling, 12-month emissions limitations, all exceedances of the rolling, 12-month throughput limitations;

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 Director (the appropriate District Office or local air agency).

(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.

e) Testing Requirements

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

a. Emission Limitation:

95.04 tons per year VOC from all emissions units at this facility.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by calculating the rolling 12-month summation of emissions determined by paragraphs i. thru v. below:

i. VOC emissions from all storage tanks at the facility shall be determined by estimating emissions using the most recent version of EPA's Tanks computer software or the most recent emission factors for storage tanks contained in AP-42 Chapter 7.

ii. Fugitive VOC emissions from equipment leaks shall be determined by using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates".

iii. VOC emissions from gasoline truck loading shall be determined using AP-42 section 5.2 dated June 2008, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Section 5.2-6, dated June 2008)

iv. VOC emissions from distillate loading shall be determined using AP-42 Section 5.2, dated June 2008.

v. VOC emissions from ethanol loading shall be determined using AP-42 Section 5.2, dated June 2008.

b. Emission Limitation:

The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year of any individual HAP, and 24.5 tons per year for any combination of HAPs, as a rolling 12 month summations.

Applicable Compliance Method:

For every individual HAP, multiply the following emission factors by the actual monthly VOC emission rate (in tons per month) for all VOC emissions from the facility, including fugitive emissions. For each monthly individual HAP emission rate calculated, add the monthly total to the total for the previous 11 months to determine the rolling 12-month summation of individual HAP emissions. To determine the 12-month rolling summation of any combination of HAPs, calculate the sum of the rolling 12-month summation of all individual HAP emissions.

The HAP emissions from truck loading and storage shall be determined using the following emission factors:

HAP Emissions (lb/lb VOC) from Gasoline (From Tanks 4.0 speciation)

isopropyl benzene	2.98E-04
1,2,4trimethyl benzene	1.37E-03
hexane	3.79E-03
benzene	4.48E-03
isooctane	5.60E-03
tolulene	7.43E-03
ethylbenzene	9.68E-04
xylene	4.64E-03
cyclohexane	6.16E-04

HAP emissions (lb/lb VOC) from Distillate (From Tanks 4.0 speciation)

1,2,4trimethyl benzene	1.72E-02
hexane	1.86E-04

benzene	8.89E-04
tolulene	9.74E-03
ethylbenzene	1.25E-03
xylene	2.32E-02

Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable in a written agreement to the Ohio EPA and CITGO Petroleum Corporation.

C. Emissions Unit Terms and Conditions

1. J001, Loading Rack

Operations, Property and/or Equipment Description:

loading rack comprised of 3 bays with 12 unloading arms handling up to 3000 gpm of gasoline, 1200 gpm of ethanol and 1200 gpm of distillate, all controlled by a vapor balance system with a regenerative carbon adsorber

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 3745-31-05(A)(3) (PTI 04-01427 as issued 1/26/2006)	emissions of volatile organic compounds (VOC) shall not exceed 54.35 pounds per hour and 17.00 tons per year from the carbon adsorber stack fugitive emissions of VOC shall not exceed 11.74 tons per year from the truck loading operations see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D) (PTI 04-01427 as issued 1/26/2006)	see b)(2)d. and b)(2)e.
c.	OAC rule 3745-21-09(Q)	see b)(2)f.
d.	40 CFR Part 60, Subpart A (40 CFR 60.1 through 60.19)	see b)(2)g.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 60, Subpart XX (40 CFR 60.500 through 60.506) [In accordance with 40 CFR 60.500 this emissions unit is a loading rack at an existing bulk gasoline terminal which delivers liquid product into gasoline tank trucks and subject to the emissions limitations/control measures specified in this section.]	emissions to the atmosphere from the vapor collection system due to loading of liquid product into gasoline tank trucks shall not to exceed 35 milligrams of total organic compounds (TOC) per liter of gasoline loaded (0.292 pound of TOC per 1000 gallons) [40 CFR 60.502(b)] see b)(2)h.

(2) Additional Terms and Conditions

a. The permittee shall control the emissions from loading of all fuels with a regenerative carbon adsorber.

b. The hourly and annual VOC emission limitations were established for PTI purposes to reflect the controlled potential to emit for this emissions unit. Therefore, provided that the regenerative carbon adsorber system is operating properly, and the maximum annual throughput limitations are not exceeded, is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q) and 40 CFR Part 60 Subpart XX.

d. The combined emissions of VOC from all emissions units at this facility shall be restricted to 95.04 tons per year as a rolling, 12-month summation as made enforceable in section B.2. of this permit

e. The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be restricted to 9.9 tons per year for any individual HAP, and 24.5 tons per year for any combination of HAPs as a rolling, 12-month summations as made enforceable in section B.2. of this permit

f. The permittee shall comply with the applicable operating restrictions, monitoring, recordkeeping and reporting requirements of OAC rule 3745-21-09(Q).

g. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

h. This emissions unit is subject to the applicable provisions of Subpart XX of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

(1) For purposes of compliance with the control requirements of OAC rule 3745-31-05:

a. the annual distillate throughput for this emissions unit shall not exceed 630,700,000 gallons based upon a calendar year summation of the monthly throughputs as made enforceable in section B.2. of this permit;

b. the annual ethanol throughput for this emissions unit shall not exceed 60,000,000 gallons based upon a calendar year summation of the monthly throughputs as made enforceable in section B.2. of this permit;

c. the annual gasoline throughput for this emissions unit shall not exceed 109,900,000 gallons based upon a calendar year summation of the monthly throughputs as made enforceable in section B.2. of this permit; and

d. the following carbon adsorption/gasoline absorption vapor recovery unit (VRU) parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:

i. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg. This vacuum level shall be maintained while the air purge solenoid is open, during the carbon polishing phase (final minutes) of the regeneration;

ii. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;

iii. to ensure proper flow of gasoline to the adsorber nozzle and the seal cooler when the vapor recovery unit is operating, a differential pressure of 49 inches of water column (1.77 psi) shall be maintained across the orifice plate, located in the gasoline supply; and,

iv. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 150 degrees F.

Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

(2) For purposes of compliance with OAC rule 3745-21-09(Q):

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

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

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

b. The loading rack shall be equipped with a vapor control system whereby:

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

ii. the mass emissions of VOC from the vapor control system do not exceed 0.67 pound of VOC per 1,000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel; and

iii. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

c. The loading rack shall be provided with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

d. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

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

f. The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

(3) The permittee shall comply with the applicable restrictions under 40 CFR Part 60, Subpart XX, including the following sections:

60.502(a)	this emissions unit shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading

60.502(d)	each vapor collection system shall be designed to prevent any total organic compound vapors collected at one loading rack from passing to another loading rack
60.502(e)	loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: a. the permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility; b. the permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility; c. the permittee shall cross-check each tank identification number obtained in paragraph b. of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: i if less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or ii. if less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually; and iii. if either the quarterly or semiannual cross-check provided in c.i or c.ii. reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met. d. the permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph c. of this section; e. the permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained; and f. alternate for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator of USEPA.
60.502(f)	the permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system
60.502(g)	the permittee shall act to assure that the terminal's and the truck's vapor collection systems are connected during each loading of a gasoline tank truck

60.502(h)	the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d)
60.502(i)	no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water)

d) Monitoring and/or Recordkeeping Requirements

(1) For purposes of compliance with the requirements of OAC rule 3745-31-05:

a. thepermittee shall properly install, operate, and maintain equipment to monitor the gasoline supply temperature, the absorber pressure, the carbon bed temperature (at all levels), and the carbon bed vacuum while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s); and

b. the permittee shall collect and record the following information once each day (Monday through Friday, excluding holidays):

i. the temperature of the carbon bed after any regeneration cycle, including any cooling cycle(s);

ii. the temperature of the carbon bed, at all levels;

iii. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

iv. the maximum carbon bed vacuum in inches of mercury during regeneration of the recorded bed;

v. the gasoline supply temperature, in degrees F; and

vi. the differential pressure across the orifice plate in the gasoline supply line in psi.

(2) For purposes of compliance with OAC rule 3745-21-09(Q):

a. the permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed,

calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s); and

b. the permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart XX, including the following sections:

60.502(j)	each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected
60.505(a)	the tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection
60.505(b)	the documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information: a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27); b. tank owner and address; c. tank identification number; d. testing location; e. date of test; f. tester name and signature; g. name, signature, and affiliation of witnessing inspector, if any; and h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

60.505(c)	a record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information: a. date of inspection; b. findings (may include no leak(s) discovered, or the location, nature and severity of leak(s)); c. leak determination method; d. corrective action taken, including the date each leak was repaired and the reason for any repair interval in excess of 15 days; and e. inspector name and signature

e) Reporting Requirements

(1) For purposes of compliance with OAC rule 3745-21-09(Q): any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.

(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. for purposes of compliance with the control requirements of OAC rule 3745-31-05, any parameter readings that are outside of the acceptable value or range for each vapor collection system and VRU key operating parameter; and

ii. allexceedances of the calendar year throughput limitations.

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 Director (the appropriate District Office or local air agency).

(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) 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.

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 Limitation:

35 mg of total organic compounds per liter of gasoline loaded.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503. The most recent test was performed on April 18, 2012 and resulted in an emission rate of 0.31 mg of total organic compounds per liter of gasoline loaded.

b. Emission Limitation:

54.35 pounds per hour VOC from carbon adsorber exhaust

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

(35 mg/l x 3.785 l/gal x lb/454 g x g/1000 mg x 180,000 gal of gasoline/hr) + [(1.29 lb/1000 gal x 72,000 gal of ethanol/hr) + (0.045 lb/1000 gal x 72,000 gal of distillate/hr)][1-0.981][0.987]

where:

98.7% is the capture efficiency and 98.1% is the control efficiency by weight

35 mg/l is demonstrated through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503.

180,000 gal/hr gasoline and 72,000 gal/hr ethanol and distillate are maximum loading rates.

1.29 lb/1000 gal and 0.045 lb/1000 gal distillate are emission factors derived by calculations using AP-42 Section 5.2, Equation (1) dated June 2008:

$$L = 12.46\ SPM/T$$

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (1)

P = true vapor pressure, psia (ethanol = 1.218, distillate = 0.015)

M = molecular weight. lb/lb mole (ethanol = 46.07, distillate = 130)

T = temperature of bulk liquid, degrees R (540)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503 and OAC rule 3745-21-10(E).

c. Emission Limitation:

17.00 tons per year VOC from carbon adsorber exhaust.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

(35 mg/l x 3.785 l/gal x lb/454 g x g/1000 mg x 109,900,000 gal of gasoline/yr) + [(1.29 lb/1000 gal x 60,000,000 gal of ethanol/yr) + (0.045 lb/1000 gal x 630,700,000 gal of distillate/yr)][1-0.981][0.987]}÷2000 lb/ton

where:

98.7% is the capture efficiency and 98.1% is the control efficiency by weight

35 mg/l is demonstrated through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503.

109,900,000 gal/yr gasoline, 60,000,000 gal/yr ethanol and 630,700,000 gal/yr distillate are enforceable limits.

1.29 lb/1000 gal and 0.064 lb/1000 gal distillate are emission factors derived by calculations using AP-42 Section 5.2, Equation (1) dated June 2008:

L = 12.46 SPM/T

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (1)

P = true vapor pressure, psia (ethanol = 1.218, distillate = 0.015)

M = molecular weight. lb/lb mole (ethanol = 46.07, distillate = 130)

T = temperature of bulk liquid, degrees R (540)

d. Emission Limitation:

11.74 tons per year fugitive VOC.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

[(15.47 lb/1000 gal x 109,900,000 gal of gasoline/yr) + (1.29 lb/1000 gal x 60,000,000 gal of ethanol/yr) + (0.045 lb/1000 gal x 630,700,000 gal of distillate/yr)][1-0.987]÷2000 lb/ton

where:

98.7% is the capture efficiency

109,900,000 gal/yr gasoline, 60,000,000 gal/yr ethanol and 630,700,000 gal/yr distillate are enforceable limits.

15.47 lb/1000 gal gasoline, 1.29 lb/1000 gal ethanol and 0.045 lb/1000 gal distillate are emission factors derived by calculations using AP-42 Section 5.2, Equation (1) dated June 2008:

L = 12.46 SPM/T

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded

S = a saturation factor (1)

P = true vapor pressure, psia (RVP15= 11.59, ethanol = 1.218, distillate = 0.015)

M = molecular weight, lb/lb mole (RVP15 = 57.84, ethanol = 46.07, distillate = 130)

T = temperature of bulk liquid, degrees R (540)

(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 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): the procedures and method(s) detailed in 40 CFR 60.503. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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).

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.

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 – external floating roof storage tanks greater than 40,000 gallons in capacity and installed between 1949 and 1953: T006, T011 and T012

EU ID	Operations, Property and/or Equipment Description
T006	external floating roof tank, 180,000 bbl (7,560,000 gal), tank 223 – in gasoline service
T011	external floating roof tank, 98,700 bbl (4,145,400 gal), tank 281 – in gasoline service
T012	external floating roof tank, 99,000 bbl (4,158,000 gal), tank 282 – in gasoline service

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(Z)	See b)(2)a. and b)(2)b.
b.	40 CFR 60 Subpart K,Ka,Kb	Exempt, installed prior to June 11, 1973

(2) Additional Terms and Conditions

a. The permittee shall equip the storage vessel with an external floating roof.

b. The welded external floating roof storage tank, equipped with a mechanical shoe primary seal and a rim-mounted secondary seal shall meet the following requirements:

i. There shall be no visible holes, tears, or other openings in the seal or seal fabric.

ii. For the primary seal, the total seal gap area shall not exceed 10.0 square inches per foot of tank diameter.

iii. For the secondary seal, the total seal gap area shall not exceed 1.0 square inch per foot of tank diameter.

The permittee may change the seal types during the term of this permit provided that a written notification and revised "emission activity category" form, including the results of the latest seal gap measurements, are submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the change occurs.

c) Operational Restrictions

(1) The external floating roof tank shall be maintained using the following control measures:

a. Any opening in the external floating roof, except automatic bleeder vents, rim space vents, leg sleeves, stub drains, and slotted gauging/sampling wells shall be equipped with:

i. a cover, seal, or lid which remains in the closed position at all times without any visible gaps, except when the opening is in actual use; and

ii. a projection into the tank below the liquid surface.

b. Any automatic bleeder vent shall remain in the closed position, except when the external floating roof is floated off or landed on the roof leg supports.

c. Any rim vent shall be set to open at the manufacturer's recommended setting, except when the external floating roof is being floated off the roof leg supports.

d. Any emergency roof drain shall be equipped with a slotted membrane fabric cover or other device which covers at least 90 percent of the area of the opening.

e. Any stub drain shall be equipped with a projection into the tank below the liquid surface.

f. Any slotted gauging/sampling well shall be equipped with an object which floats on the liquid surface within the well and which covers at least 90 percent of the area of the well opening.

d) Monitoring and/or Recordkeeping Requirements

(1) The seals of the external floating roof tank shall be inspected as follows:

a. The seal and seal fabric shall be inspected annually for visible holes, tears, or other openings.

b. The secondary seal gap shall be measured annually, in accordance with the method specified in paragraph (I) of OAC rule 3745-21-10.

c. The primary seal gap shall be measured at least once every 5 years, in accordance with the method specified in paragraph (I) of OAC rule 3745-21-10.

(2) The seal gaps shall be measured to determine the width and area of the gaps between the wall of the external floating roof tank and the seal around the circumference of the roof. The width of the seal gap shall be determined using probes of the appropriate width, to accurately measure the actual distance from the seal to the tank wall. The area of the seal gap shall be determined by multiplying the width of the seal gap by the circumferential length of the gap. The total seal gap area is the accumulated area of all gaps which are greater than 0.125 inch in width.

(3) The permittee shall maintain records of the following information for at least two years:

a. the dates and results of each seal and seal fabric inspection and each seal gap measurement; and

b. the annual throughput of each petroleum liquid stored in the tank.

A copy of these records shall be made available to the Director or an authorized representative of the Director upon written or verbal request.

(4) The permittee shall maintain records of the following information for at least five years:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

A copy of these records shall be made available to the Director or an authorized representative of the Director upon written or verbal request.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of any seal and seal fabric inspection or any seal gap measurement, which documents a violation of the applicable control equipment requirements. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

(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.

(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) None.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group – internal floating roof storage tanks greater than 19,812 gallons in capacity and modified after July 23, 1984: T014, T019 and T020

EU ID	Operations, Property and/or Equipment Description
T014	internal floating roof tank, 80,000 bbl (3,360,000 gal), tank 210 in gasoline service
T019	internal floating roof tank, 29,000 bbl (1,218,000 gal), tank 218 in gasoline service
T020	internal floating roof tank, 30,000 bbl (1,260,000 gal), tank 219 in gasoline service

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 3745-31-05(A)(3) (PTI 04-01427 as issued 1/26/2006)	The emissions of volatile organic compounds (VOC) shall not exceed: 9.11 tons per year from T014; 6.39 tons per year from T019; and 4.52 tons per year from T020. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-09(L)	See b)(2)c.
c.	40 CFR 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)d.
d.	40 CFR 60 Subpart Kb (40 CFR 60.110b through 60.117b) [In accordance with 40 CFR 60.110b this emissions unit is a storage	See b)(2)e. and b)(2)f. [40 CFR 60.112b]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	vessel with a capacity greater than or equal to 75 cubic meters (m3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification was commenced after July 23, 1984 and subject to the emissions limitations/control measures specified in this section.]	

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR 60 Subpart Kb.

b. The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at the restricted throughput level for the entire facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

c. The permittee shall install and maintain a fixed roof in combination with an internal floating roof for this emissions unit.

d. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

e. This emissions unit is subject to the applicable provisions of Subpart Kb of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

f. The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

g. The provisions of 40 CFR Part 60, Subpart Kb do not apply when storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). Provided that the permittee maintains records adequate to demonstrate compliance with this vapor pressure restriction, the requirements for this emissions unit included under the authority of 40 CFR Part 60, Subpart Kb shall become void.

c) Operational Restrictions

(1) The annual gasoline throughput level for the entire facility shall not exceed 1,177,344,000 gallons per year as made enforceable by the monitoring recordkeeping and reporting requirements of section B.2. of this permit.

(2) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.

(3) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(b)	The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the

	source.
60.112b(c)	The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
60.113b(a)(1)	Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
60.113b(a)(2)	For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
60.113b(a)(3)	For vessels equipped with a double-seal system as specified in 60.112b(a)(1)(ii)(B), vVisually inspect the vessel as specified in 60.113b(a)(4) at least every 5 years; or visually inspect the vessel as specified in 60.113b(a)(2).
60.113b(a)(4)	Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that

	none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 60.113b(a)(2) and 60.113b(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in 60.113b(a)(3)(i).
60.115b(a)(2)	The permittee shall keep a record of each inspection performed as required by 60.113b(a)(1), (a)(2), (a)3) and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
60.116b(a)	The permittee shall keep copies of all records for at least 2 years.
60.116b(b)	The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source
60.116b(c)	The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA office or local air agency as are required pursuant to 40 CFR Part 60, Subpart Kb, per the following sections:

60.115b(a)(3)	If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

60.115b(a)(4)	After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii) a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) or 40 CFR 60.113b(a)(3)) and list each repair made.
60.113b(a)(5)	Notify the Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 60.113b(a)1 and (a)(4) to afford the Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by 60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Toledo Division of Environmental Services at least 7 days prior to the refilling.

(3) 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.

(4) 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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.11 tons of VOC per year from T014,

6.39 tons of VOC per year from T019, and

4.52 tons of VOC per year from T020.

Applicable Compliance Method

This emission limitation was developed by using the most recent version of EPA's Tanks computer software at the restricted gasoline throughput level for the entire facility. Therefore, if compliance is shown with the restricted throughput level for the entire facility in section B.2., compliance shall also be shown with the annual emission limitation for this emissions unit.

g) Miscellaneous Requirements

(1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

b. The vapor pressure may be obtained by the following:

i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference, see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

iii. For other liquids, the vapor pressure:

(a) May be obtained from standard reference texts; or

(b) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference, see 40 CFR 60.17); or

(c) Measured by an appropriate method approved by the Administrator; or

(d) Calculated by an appropriate method approved by the Administrator.

4. Emissions Unit Group – internal floating roof storage tanks greater than 40,000 gallons in capacity and installed between 1936 and 1954: T001, T002, T004, T005, T015, T024, T029, T030, T035 and T037

EU ID	Operations, Property and/or Equipment Description
T001	internal floating roof tank, 10,000 bbl (420,000 gal), tank 114 – in transmix service
T002	internal floating roof tank, 10,000 bbl (420,000 gal), tank 115 – in transmix service
T004	internal floating roof tank, 56,000 bbl (2,352,000 gal), tank 217 – in gasoline service
T005	internal floating roof tank, 99,000 bbl (4,158,000 gal), tank 222 – in gasoline service
T015	internal floating roof tank, 100,000 bbl (4,200,000 gal), tank 283 – in gasoline service
T024	internal floating roof tank, 4,800 bbl (185,430 gal), tank 236 – in gasoline service
T029	internal floating roof tank, 10,000 bbl (420,000 gal), tank 244 – in gasoline service
T030	internal floating roof tank, 10,000 bbl (420,000 gal), tank 245 – in gasoline service
T035	internal floating roof tank, 56,000 bbl (2,352,000 gal), tank 209 – in gasoline service
T037	internal floating roof tank, 10,000 bbl (420,000 gal), tank 116 – in transmix service

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 b)(2)a.
b.	40 CFR 60 Subpart K,Ka,Kb	Exempt, installed prior to June 11, 1973

(2) Additional Terms and Conditions

a. The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.

c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.

d. 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. the types of petroleum liquids stored in the tank; and

b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

(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.

(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) None.

g) Miscellaneous Requirements

(1) None.