

Facility ID: 1667020018 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020018 Emissions Unit ID: J001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck loading rack with McGill vapor recovery system (carbon adsorber/absorber)	OAC rule 3745-21-09(Q)	0.67 pounds VOC emissions per 1000 gallons gasoline loaded

See A.2 below

2. Additional Terms and Conditions

- (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.
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. 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; and
 - iii. the mass emissions of VOC from the vapor recovery control system do not exceed 0.67 pound of VOC per 1000 gallons (80 milligrams of VOC per liter) of gasoline loaded into the delivery vessel.
All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
A means shall be provided 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.
In accordance with Ohio EPA, Division of Air Pollution Control Engineering Guide 61, this facility is not a major source due to Presumed Inherent Physical Limitations. The facility shall maintain records of actual emissions to document ongoing non-major status, as detailed in section C of these terms and conditions. If this emissions unit should exceed any of the Presumed Inherent Physical Limitations thresholds (20 TPY VOC, 2.0 TPY of any single HAP, or 5.0 TPY combined HAPs), then the facility shall have one year to obtain a FESOP or submit a complete Title V permit application.

B. Operational Restrictions

1. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
2. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system 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. Any tank truck used in conjunction with this emissions unit must comply with the requirements of OAC rule 3745-21-09(V), if applicable.
4. The following vapor recovery unit parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the vapor recovery unit within these acceptable operating ranges:

- a. 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 and the air purge solenoid must be open;
- b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees Fahrenheit;
- c. to ensure a proper flow rate from the absorption tower to the carbon bed, the absorber pressure shall be maintained between 8 psi and 15 psi; and
- d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 150 degrees Fahrenheit.

Operation of the vapor recovery unit 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.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for the purpose of documenting ongoing non-major status, in accordance with Ohio EPA, Division of Air Pollution Control Engineering Guide 61:
 - a. the total, individual throughputs of gasoline and distillates, in gallons; and
 - b. the rolling, 12-month summation of the total, individual throughputs of gasoline and distillates, in gallons.
- 2. The permittee shall calculate annually the individual and combined HAP emissions and VOC emissions based on the records required in section C.1, for the purpose of documenting ongoing non-major status in accordance with Ohio EPA, Division of Air Pollution Control Engineering Guide 61.
- 3. The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the McGill vapor recovery unit which has been approved by the Akron Regional Air Quality Management District (ARAQMD). The PMP shall include an annual inspection of the vapor recovery unit by a qualified individual trained in the operation and inspection of carbon adsorption/absorption systems. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the ARAQMD.

The permittee shall maintain the data required by the "McGill Daily Operating Check Sheet" on a daily basis. The permittee shall submit a copy of the check sheet to the ARAQMD within 90 days of the issuance of this permit. Any subsequent changes to this check sheet shall be mutually agreeable to the AMOCO Oil Company and ARAQMD.

The permittee shall collect and record the following information daily for the control equipment, for every day that the facility is staffed (typically Monday through Friday):

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation;
- b. the vacuum pressure during the regeneration cycle, in inches of Hg;
- c. the gasoline supply temperature, in degrees Fahrenheit;
- d. the absorber pressure, in psi; and
- e. the carbon bed temperatures, in degrees Fahrenheit.

D. Reporting Requirements

- 1. The permittee shall submit an annual report indicating whether or not this facility continues to meet the definition of a non-major source, as expressed in section A.2.e of these terms and conditions. These reports shall include the emission calculations required in section C.2.

These reports shall also include the identification of any parameter readings that were outside of the acceptable range/value for each vapor recovery unit key operating parameter established in section B.4. These reports shall document the cause of each exceedance and shall include an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future. If no parameter deviations occurred during the 12-month period, the permittee shall make a negative declaration in the annual report.

These reports shall be submitted by March 15 of each year and shall reflect the record keeping and monitoring performed during the previous calendar year.

E. Testing Requirements

- 1. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

The emissions testing shall be conducted within 6 months prior to permit expiration. (This emissions unit most recently demonstrated compliance on November 2, 1995, with an emission rate of 2.45 mg VOC/liter gasoline (0.0205 lb/gal).)

The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC. The testing shall be conducted in accordance with the procedures listed in OAC rule 3745-21-10(E).

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for VOC, methods 2A, 21, and 25B of 40 CFR Part 60, Appendix A.

- 2. 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).

F. **Miscellaneous Requirements**

1. None