



Environmental Protection Agency

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

4/20/2011

Certified Mail

Paul Logsdon
Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0302020012
Permit Number: P0107934
Permit Type: Administrative Modification
County: Allen

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
Yes	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

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

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

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

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana



FINAL

Division of Air Pollution Control
Permit-to-Install
for
Lima Refining Company

Facility ID: 0302020012
Permit Number: P0107934
Permit Type: Administrative Modification
Issued: 4/20/2011
Effective: 4/20/2011



Division of Air Pollution Control
Permit-to-Install
for
Lima Refining Company

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Authorization

Facility ID: 0302020012
Facility Description: Petroleum Refinery and Storage
Application Number(s): A0041531
Permit Number: P0107934
Permit Description: Administrative modification to PTI #03-2072. The PTI is being corrected to reflect the LIU flare as an alternate control device, and to clarify that the refinery's alternative LDAR plan is used to meet the requirements of 40 CFR, Part 60, Subpart J.
Permit Type: Administrative Modification
Permit Fee: \$500.00
Issue Date: 4/20/2011
Effective Date: 4/20/2011

This document constitutes issuance to:

Lima Refining Company
1150 South Metcalf Street
Lima, OH 45804

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

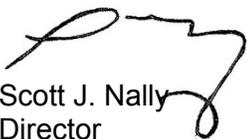
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107934
Permit Description: Administrative modification to PTI #03-2072. The PTI is being corrected to reflect the LIU flare as an alternate control device, and to clarify that the refinery's alternative LDAR plan is used to meet the requirements of 40 CFR, Part 60, Subpart J.

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

Emissions Unit ID:	P023
Company Equipment ID:	Loading Rack
Superseded Permit Number:	03-2072
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P023, Loading Rack

Operations, Property and/or Equipment Description:

Benzene Single RR Car and TK Truck Loading Rack

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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)	5.16 lbs of benzene/hr
b.	40 CFR, Part 61, Subpart J	See b)(2)a.
c.	40 CFR, Part 61, Subpart V	See b)(2)a.
d.	40 CFR, Part 61, Subpart BB	See b)(2)b. through b)(2)m., d)(4) through d)(9), e)(1), and f)(2) through f)(7)
e.	40 CFR, Part 61, Subpart A	See 40 CFR 61.01 through 61.19
f.	40 CFR, Part 63, Subpart EEEE [40 CFR 63.2330 – 63.2406] [In accordance with 40 CFR 63.2334, this emissions unit is an affected source consisting of an organic liquids distribution (OLD) operation, subject to the emission limitations/control measures specified in this section.]	See b)(2)b. through b)(2)o., d)(10), e)(2) and f)(8)
g.	40 CFR, Part 63, Subpart SS [40 CFR 63.980 – 63.999] [In accordance with 40 CFR 63.980, the provisions of Subpart SS include requirements for closed vent systems, control devices and routing of air emissions to a fuel gas system or process. These provisions apply since 40 CFR, Part 63, Subpart EEEE references the use of this Subpart for such air emission	See b)(2)p., d)(11), e)(3) and f)(9) These air emission standards are placed here for administrative convenience and only apply to those permittees of facilities subject to a referencing subpart. The provisions of 40 CFR, Part 63, Subpart A (General Provisions) do not apply to this subpart except as specified in a referencing subpart.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	control.]	
h.	40 CFR 63.1 through 63.15	Table 12 to 40 CFR, Part 63, Subpart EEEE – Applicability of General Provisions to Subpart EEEE shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply.
i.	OAC rule 3745-21-07(E)	See b)(2)n and q.

(2) Additional Terms and Conditions

- a. The requirements of this rule are equivalent to or less stringent than the alternative leak detection and repair (LDAR) plan submitted by the permittee. Terms and conditions for the alternative LDAR plan are listed in section B.2 of the Facility-Wide Terms and Conditions of the renewal Title V permit.
- b. When using the flare (LIU flare, emissions unit P007) as a control device for P023, the permittee shall meet the requirements in 63.983 for closed vent systems; 63.987 for flares; 63.997(a), (b) and (c) for provisions regarding flare compliance assessments; the monitoring, recordkeeping, and reporting requirements referenced therein; and the applicable recordkeeping and reporting requirements of 63.998 and 63.999.
- c. Pursuant to the Ohio EPA approval letter dated March 21, 2007, when operating the scrubber as the control device for P023, the permittee shall comply with the U.S. EPA approved Alternative Monitoring Plan (AMP) to comply with the requirements of 40 CFR, Part 61, Subpart BB and 40 CFR, Part 63, Subpart EEEE, which, as stated in the approved AMP, is consistent with existing terms and conditions.
- d. The permittee shall equip each loading rack with a vapor collection system that is:
 - i. Designed to collect all benzene vapors displaced from tank trucks and railcars during loading, and
 - ii. Designed to prevent any benzene vapors collected at one loading rack from passing through another loading rack to the atmosphere.
- e. The permittee shall install a control device and reduce benzene emissions routed to the atmosphere through the control device by 98 weight percent.
- f. The permittee shall operate any flare used to comply with 40 CFR 61.302(b) in accordance with the requirements of 40 CFR 60.18(b) through (f), and comply with 63.987 as specified in 40 CFR, Part 63, Subpart EEEE, Table 3, option 7.

- g. The permittee shall limit the loading of benzene into vapor-tight tank trucks and vapor-tight railcars using the following alternative method for each car every time the car is loaded:
- i. Connect the loading arms, vent connections, grounding cable, etc. per the loading procedures.
 - ii. Pressurize each car with nitrogen to 30psig. For new cars, or cars returning from the maintenance shop, the nitrogen pressure must be taken to 35 psig.
 - iii. When the nitrogen pressure reaches 30 psig (or 35 psig for new or repaired cars) at the vent end pressure gauge of each car, close the nitrogen valve to each car.
 - iv. Using liquid soap, spray each of the following: every flange, isolation valves, safety valves, bleed valves, manways (top and bottom), and level probe connections.
 - v. Report any and all leaks to the Operating Supervisor and repair as needed.
 - vi. If a major repair is needed, such as changing out a safety valve or replacing a valve or hose gasket; after the repair, re-pressure that particular car and re-soap for leaks.
 - vii. When all leaks are repaired or if there were no leaks, slowly release the pressure from each car to 10 psig or less to the benzene vent scrubber.
 - viii. Continue with the normal loading procedure.
- h. The permittee shall limit loading of benzene to tank trucks and railcars equipped with vapor collection equipment that is compatible with the affected facility's vapor collection system.
- i. The permittee shall limit loading of tank trucks and railcars to tank trucks and railcars whose collection systems are connected to the affected facility's vapor collection systems.
- j. The permittee shall ensure that the vapor collection and benzene loading equipment of tank trucks and railcars shall be designed and operated to prevent gauge pressure in the tank truck or railcar tank from exceeding, during loading, the initial pressure the tank was pressured up to and shown to be vapor tight at during the most recent vapor-tightness test using Method 27 of Appendix A to 40 CFR, Part 60. As an alternative to Method 27, the permittee may use the procedures listed in term and condition b)(2)g.i. through b)(2)g.viii. of this emissions unit, as allowed by 40 CFR 61.302(d)(3) to conduct the vapor-tightness test. This vapor-tightness test pressure is not to be exceeded when measured by the procedures specified in 40 CFR 61.304(c).

- k. The permittee shall ensure that no pressure-vacuum vent in the affected facility's vapor collection system for tank trucks and railcars shall begin to open at a system pressure less than the maximum pressure at which the tank truck or railcar is operated.
- l. The permittee shall inspect the vapor collection system and the control device for detectable emissions, and shall repair any leaks detected, in accordance with 40 CFR 61.242-11 (e) and (f). This inspection of the vapor collection system and control device shall be done during the loading of tank trucks or railcars.
- m. Vent systems that contain valves that could divert a vent stream from a control device shall have car-sealed opened all valves in the vent system from the emission source to the control device, and car-sealed closed all valves in the vent system that would lead the vent stream to the atmosphere, either directly or indirectly, bypassing the control device.
- n. The requirements of this rule are less than stringent than the requirements of 40 CFR, Part 61, Subpart BB.
- o. The permittee shall comply with the applicable control requirements, operating limits and emission limits under 40 CFR, Part 63, Subpart EEEE, including the following sections:

63.2346(b)	Transfer Racks Control Requirements
63.2346(b)(1) and Table 2	Transfer Racks Emission Limits
63.2346(d)	Transport Vehicle Control Requirements
63.2346(e) and Table 3	Transfer Rack Operating Limits
63.2346(g)	Procedures for Requesting Alternative Standards
63.2346(i)	Safety Device
63.2350(a) through 63.2350(c)	Comply at all times, Comply with 63.6(e)(1)(i) and Develop Startup, Shutdown and Malfunction Plan
63.2354(a)(2)	Design Evaluation Procedures
63.2354(c)	HAP Content Determination Procedures
63.2358(b)(1) and 63.2358(c)(2)	Initial Compliance Demonstration Date – Emission Limits and Work Practices
63.2370(a), 63.2370(b), and Tables 5 through 7	Initial Compliance Demonstration for Loading Rack Design Evaluation,



	Transport Vehicles
63.2378(b)(1) through 63.2378(b)(3)	Startup, Shutdown and Malfunction Requirements
63.2378(c)	Limits on Planned Routine Maintenance
63.2396(b)	Regulatory Overlap with 40 CFR, Part 61, Subpart BB

- p. The permittee shall comply with the applicable control and operating requirements under 40 CFR, Part 63, Subpart SS, including the following sections:

63.985(b)(1)(i)(A)	Design Evaluation
63.990(a)(1)	Equipment and Operating Requirements
63.990(a)(2)	Operate Control Device At All Times Emissions Are Vented To It.

- q. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c) Operational Restrictions

- (1) The permittee shall use submerged fill whenever this emissions unit is in operation.
- (2) Pursuant to the U.S. EPA approval letter dated November 12, 1998 for alternate monitoring parameters in accordance with 40 CFR 63.151(g), the following operating parameters shall be met by the permittee when operating the benzene vent scrubber as the control device:

- a. benzene vent scrubber:
 - i. maintain the lean solvent temperature less than 120 degrees Fahrenheit.
 - ii. maintain the rich solvent pH greater than 6.5.
 - iii. maintain the rich solvent percent hydrocarbon less than 10 percent.
 - b. tetra stripper solvent regenerator:
 - i. maintain the bottoms temperature greater than 275 degrees Fahrenheit.
- (3) The permittee shall operate the benzene vent scrubber or the LIU flare as the control device for this emissions unit whenever clean tank trucks and/or railcars are being loaded.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall include the benzene single railroad car and tank truck loading rack fugitive emissions and associated components in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall be conducted in accordance with the alternative monitoring plan submitted by the permittee. Applicable requirements are listed in section B.2 of the Facility-Wide Terms and Conditions of the renewal Title V permit.
 - (2) The permittee shall calibrate, maintain, and operate according to manufacturer's specifications, device(s) to continuously monitor the temperature of the scrubber absorbing fluid. The device(s) shall be operated such that the benzene vent scrubber lean solvent temperature and tetra stripper solvent regeneration bottoms temperature can be determined.
 - (3) The permittee shall obtain daily samples of the scrubber absorbing fluid and conduct an analysis of the fluid for rich solvent pH and rich solvent percent hydrocarbon.
 - (4) The permittee of an affected facility who wishes to demonstrate compliance with the standards specified under 40 CFR 61.302(b) using control devices other than an incinerator, steam generating unit, process heater, carbon adsorber, or flare shall provide the Administrator with information describing the operation of the control device and the process parameter(s) that would indicate proper operation and maintenance of the device.

The Administrator may request further information and will specify appropriate monitoring procedures or requirements.
 - (5) Each permittee of an affected facility complying with 40 CFR 61.302(e)(1) shall install, calibrate, maintain, and operate a recording pressure measurement device (magnehelic gauge or equivalent device) and an audible and visible alarm system that is activated when the pressure vacuum specified in 40 CFR 61.302(e)(1) is not attained. The permittee shall place the alarm system so that it can be seen and heard where cargo transfer is controlled and on the open deck.

- (6) Permittees using a vent system that contains valves that could divert a vent stream from a control device used to comply with the provisions of this subpart shall do one or a combination of the following:
- a. Install a flow indicator immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere. The flow indicator shall be capable of recording flow at least once every 15 minutes.
 - b. Monitor the valves once a month, checking the position of the valves and the condition of the car seal, and identify all times when the car seals have been broken and the valve position has been changed (i.e., from opened to closed for valves in the vent piping to the control device and from closed to open for valves that allow the stream to be vented directly or indirectly to the atmosphere).
- (7) If a vent system containing valves that could divert the emission stream away from the control device is used, each permittee subject to the provisions of this subpart shall keep for at least 2 years up-to-date, readily accessible continuous records of:
- a. All periods when flow is indicated if flow indicators are installed under 40 CFR 61.303(g)(1).
 - b. All times when maintenance is performed on car-sealed valves, when the car seal is broken, and when the valve position is changed (i.e., from open to closed for valves in the vent piping to the control device and from closed to open for valves that vent the stream directly or indirectly to the atmosphere bypassing the control device) if valves are monitored under 40 CFR 60.303(g)(2).
- (8) The permittee of an affected facility shall keep the vapor-tightness documentation required under 40 CFR 61.302(d) on file at the affected facility in a permanent form available for inspection.
- (9) The permittee of an affected facility shall update the documentation file required under 40 CFR 61.302(d) for each tank truck or railcar at least once per year to reflect current test results as determined by the appropriate method. The permittee shall include, as a minimum, the following information in this documentation:
- a. test title;
 - b. tank truck or railcar owner and address;
 - c. tank truck or railcar identification number;
 - d. testing location;
 - e. date of test;
 - f. tester name and signature;
 - g. witnessing inspector: name, signature, and affiliation;



- h. test results, including, for railcars and tank trucks, the initial pressure up to which the tank was pressured at the start of the test, and any repairs that were necessary to ensure vapor tightness; and
 - i. a checklist indicating that each of the procedures outlined in the alternative method has been followed.
- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart EEEE, including the following sections:

63.2366(a)	Install Continuous Monitoring System (CMS) on Control Device
63.2374(a) through 63.2374(c)	Monitoring per 40 CFR, Part 63, Subpart SS; Monitor continuously when in OLD operation except for CMS malfunction, repair and quality assurance; Excluded CMS data
63.2378(a), and Tables 8 through 10	Continuous Compliance Demonstration for Loading Rack and Transport Vehicles
63.2390(b)(2), and Tables 8 through 10	Compliance Records – Loading Rack and Transport Vehicles
63.2390(c)(1)	Transport Vehicle Tightness Records
63.2390(d)	Record of Total Actual Annual Facility-level Organic Liquid Loading Volume
63.2394(a) through 63.2394(c)	Records Format, Retention Time and Location
63.2396(e)	Monitoring and Recordkeeping Regulatory Overlap

- (11) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart SS, including the following sections:

63.990(c) and 63.990(c)(1)	Absorber Monitoring Requirements
63.996(a)(1)	Monitoring Requirements - Applicability
63.996(b)(1)	Conduct of Monitoring
63.996(b)(2)	Backup Continuous Parameter Monitoring Systems
63.996(c)(1), 63.996(c)(2)(i),	Continuous Parameter Monitoring



63.996(c)(2)(ii), 63.996(c)(2)(iii), and 63.996(c)(3) through 63.996(c)(6)	Systems: Installation and Calibration, Operation and Maintenance, Malfunction, Continuous Operation, Establish Range of Monitored Parameters, and Monitoring Alternatives
63.996(d)(1) and 63.996(d)(2)	Monitoring Alternatives
63.998(b)(1)(i) through 63.998(b)(1)(iv)	Continuous Records and Monitoring System Data Handling, and Approved Alternatives
63.998(b)(2)	Excluded Monitoring Data
63.998(b)(3)	Records of Daily Averages
63.998(b)(5)(i)(A) through 63.998(b)(5)(i)(F), 63.998(b)(5)(ii), 63.998(b)(5)(ii)(B) and 63.998(b)(5)(ii)(C)	Alternative Recordkeeping: Detect Unreasonable Data, Generates Running Average, Detect Unchanging Data, Alarm, Verify Proper Functioning, Records, Reduced Frequency Excursion and Reduced Frequency Records
63.998(b)(6)(i) and 63.998(b)(6)(ii)	Excursion Definition and Excused Excursion
63.998(c)(1) and 63.998(c)(3)	Monitoring System Records - Continuous Parameter Monitoring Systems and Absorbers

e) Reporting Requirements

- (1) Each permittee of an affected facility subject to the requirements of 40 CFR 61.302 shall submit to the Administrator quarterly reports of the following information. The permittee shall submit the initial report within 90 days after the effective date of this subpart or 90 days after startup for a source that has an initial startup date after the effective date. Subsequent quarterly reports shall be submitted on January 30, April 30, July 30 and October 30 each year.
 - a. all periods recorded under 40 CFR 61.305(c)(1) when the vent stream is diverted from the control device;
 - b. all times recorded under 40 CFR 61.305(c)(2) when maintenance is performed on car-sealed valves, when the car seal is broken, and when the valve position is changed; and
 - c. all deviations from the operational restrictions in sections c)(2)a. and c)(2)b. of this permit.



- (2) The permittee shall comply with the applicable compliance deadline and reporting requirements under 40 CFR, Part 63, Subpart EEEE, including the following sections:

63.2342(b)(1)	Compliance Deadlines
63.2342(d)	Notification Deadlines
63.2370(c)	Notice of Compliance Status – Initial Compliance Determination
63.2382(a), 63.2382(b), 63.2382(d)	Required Notification and Notification of Compliance Status
63.2386(a) through 63.2386(e), and Table 11	Compliance Reports
63.2396(e)	Reporting Regulatory Overlap

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR, Part 63, Subpart SS, including the following sections:

63.998(b)(5)(ii)(A)	Reduced Frequency Notification for Alternative Recordkeeping
63.999(b)(3)(i) through 63.999(b)(3)(iii), 63.999(b)(5) and 63.999(c)(6)(iv)	Notification of Compliance Status: Operating Range for Monitored Parameters, Rationale for Operating Range for Monitored Parameters, Definition of Operating Day, and Alternative Recordkeeping
63.999(c)(1) and 63.999(c)(6)(i)	Periodic Reports – Included Information for Transfer Racks
63.999(d)(1) and 63.999(d)(2)	Requests for Approval of Monitoring Alternatives, including Different Parameter

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

5.16 lbs of benzene/hr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be based upon the record keeping requirements specified in sections d)(2) through d)(9) for this emissions unit. If required, the permittee shall demonstrate compliance with the hourly allowable benzene emission limitation by conducting emission testing in accordance with Methods 1 through 4, and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- (2) The procedures for determining compliance with 40 CFR 61.302(b) for all control devices other than flares is as follows:
- a. All testing equipment shall be prepared and installed as specified in the appropriate test methods.
 - i. The time period for a performance test shall be not less than 6 hours, during which at least 300,000 liters of benzene are loaded. If the throughput criterion is not met during the initial 6 hours, the test may be either continued until the throughput criterion is met, or resumed the next day with at least another 6 complete hours of testing.
 - ii. For intermittent control devices:
 - (a) The vapor holder level of the intermittent control device shall be recorded at the start of the performance test. The end of the performance test shall coincide with the time when the vapor holder is at its original level.
 - (b) At least two startups and shutdowns of the control device shall occur during the performance test. If this does not occur under an automatically controlled operation, the system shall be manually controlled.
 - iii. An emission testing interval shall consist of each 5-minute period during the performance test. For each interval:
 - (a) The reading from each measurement instrument shall be recorded.
 - (b) Method 1 or 1A of 40 CFR, Part 60, Appendix A, as appropriate, shall be used for selection of the sampling site.
 - (c) The volume exhausted shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR, Part 60, Appendix A, as appropriate.
 - (d) The average benzene concentration upstream and downstream of the control device in the vent shall be determined using Method 25A or Method 25B of 40 CFR, Part 60, Appendix A, using benzene as the calibration gas. The average benzene

concentration shall correspond to the volume measurement by taking into account the sampling system response time.

- (3) The mass emitted during each testing interval shall be calculated as follows:

$$M_i = FKVsC$$

where:

M_i = Mass of benzene emitted during testing interval i , kg;

V_s = Volume of air-vapor mixture exhausted, m^3 at standard conditions;

C = Benzene concentration (as measured) at the exhaust vent, ppmv;

K = Density, (kg/ m^3 benzene), standard conditions;

$K = 3.25$ for benzene;

F = Conversion factor, (m^3 benzene/ m^3 air)(1/ppmv);

$F = 10^{-6}$; and

s = Standard conditions, 20 degrees Celsius and 760 mm Hg.

- (4) The benzene mass emission rates before and after the control device shall be calculated as follows:

$$E = (\text{summation of } M_i, i=1,n)/T$$

where:

E = Mass flow rate of benzene emitted, kg/hr;

M_i = Mass of benzene emitted during testing interval i , kg;

T = Total time of all testing intervals, hr; and

n = Number of testing intervals.

- (5) The percent reduction across the control device shall be calculated as follows:

$$R = [(E_b - E_a)/E_b](100)$$

where:

R = Control efficiency of control device, %;

E_b = Mass flow rate of benzene prior to control device, kg/hr; and

E_a = Mass flow rate of benzene after control device, kg/hr.



- (6) For the purpose of determining compliance with 40 CFR 61.302(h), the following procedures shall be used:
 - a. Calibrate and install a pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), which has a precision of +/- 2.5 mm water in the range that the tank truck or railcar was initially pressured to during the most recent vapor-tightness test.
 - b. Connect the pressure measurement device to a pressure tap in the affected facility's vapor collection system, located as close as possible to the connection with the tank truck or railcar.
 - c. During the performance test, record the pressure every 5 minutes while a tank truck or railcar is being loaded, and record the highest instantaneous pressure that occurs during each loading cycle. Every loading rack shall be tested at least once during the performance test.
 - d. If more than one loading rack is used simultaneously, then the performance test shall be conducted simultaneously to represent the maximum capacity.

(7) Immediately prior to a performance test required for determination of compliance with 40 CFR 61.302(b), all potential sources of vapor leakage in the affected facility's vapor collection system equipment shall be inspected for detectable emissions as required in 40 CFR 61.302(k). The monitoring shall be conducted only while a vapor-tight tank truck or railcar is being loaded. All identified leaks in the terminal's vapor collection system shall be repaired prior to conducting the performance test.

(8) The permittee shall comply with the applicable testing requirements under 40 CFR, Part 63, Subpart EEEE, including the following sections:

63.2362(a)	Subsequent Performance Tests
63.2362(b)(1)	Annual Vapor Tightness Testing

(9) The permittee shall comply with the applicable testing requirements under 40 CFR, Part 63, Subpart SS, including the following sections:

63.990(b)	Performance Test Requirements
63.997(b)	Prior Test Results and Waivers

g) Miscellaneous Requirements

(1) None.