

Facility ID: 0250000432 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

#### 1. Allowable Emission Limitations

The potential emissions [as defined by OAC 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for any single HAP, as a rolling, 12-month summation, and 25 TPY for any combination of HAPs, as a rolling, 12-month summation.

2. Compliance with the above-mentioned limitations shall be achieved by restricting gasoline and additive throughputs. The annual throughputs of gasoline and additive shall not exceed 1,151,798,634 gallons and 1,151,799 gallons, respectively. In order to ensure federal enforceability during the first twelve calendar months of operation after the issuance of this permit, the permittee shall not exceed the following maximum allowable, cumulative, throughput limitations (gallons):

Month(s)	Gasoline	Additive
1	95,983,219	95,983
1-2	191,966,439	191,966
1-3	287,949,658	287,950
1-4	383,932,878	383,933
1-5	479,916,097	479,916
1-6	575,899,317	575,899
1-7	671,882,536	671,883
1-8	767,865,756	767,866
1-9	863,848,975	863,849
1-10	959,832,195	959,832
1-11	1,055,815,414	1,055,815
1-12	1,151,798,634	1,151,799

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual throughput limitations shall be based upon rolling, 12-month summations.

#### 3. Record Keeping Requirements

The permittee shall maintain monthly records of the following information:

- the total, individual throughputs of gasoline and additive, in gallons;
- the cumulative, individual throughputs of gasoline and additive, in gallons, for each calendar month during the first twelve months of operation following the issuance of this permit.
- beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summations of the total, individual throughputs of gasoline and additive, in gallons.

#### 4. Reporting Requirements

a. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month throughput limitations, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative throughput levels established in (2) above.

b. The permittee shall submit annual reports which identify the following:

- the total actual emissions of each individual HAP from the facility;
- the total actual emissions of all of the HAPs from the facility; and
- the total, individual, annual throughputs of gasoline and additive.

These annual reports shall be submitted by April 15 of each year, and shall cover the previous calendar year.

5. To calculate emissions for the purpose of determining compliance with the applicable emission limitations of

this permit, the permittee shall comply with the following:

- a. VOC emissions from the storage tanks shall be determined using the USEPA's "Tanks Program 3.0."
- b. VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
- c. The VOC emissions from fugitive emissions (e.g., valves, fittings, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- d. The HAP emissions from gasoline truck loading and storage shall be determined using the following emissions factors:
  - i. benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
  - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
  - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
  - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
  - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
  - vi. n-hexane - 0.0168 pound of n-hexane emissions per pound of VOC emissions; and
  - vii. isooctane - 0.0052 pound of isooctane emissions per pound of VOC emissions.

These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th edition, Section 7.1.4, Hazardous Air Pollutant (HAP) Speciation Methodology. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA and the Sun Company, Inc.

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**b State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility: T005, Z001, Z003, and Z004, T006. Each insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

- [Go to Part III for Emissions Unit J001](#)
- [Go to Part III for Emissions Unit T001](#)
- [Go to Part III for Emissions Unit T002](#)
- [Go to Part III for Emissions Unit T003](#)
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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0250000432 Emissions Unit ID: J001 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. 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 - gasoline loading controlled by an AER Enclosed Ground Flare VRU.	OAC Rule 3745-21-09 (Q)	See Additional Terms and Conditions #2

**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:
  - (a)
    - i. all vapors displaced from the delivery vessel during loading are vented 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. 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.
  - d. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

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**II. Operational Restrictions**

1. The permittee shall not permit gasoline to be spilled, discharged in sewers, stored in open containers or handled in any other manner that would result in evaporation.
2. The permittee shall repair within fifteen days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than one hundred percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
3. The pilot flame in the flare's pilot light burner shall be maintained at all times during the loading of gasoline.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall implement, within 90 days of the issuance of this permit, a preventive maintenance program (PMP) for the AER Enclosed Ground Flare Vapor Recovery Unit (VRU) which has been approved by the Ohio EPA. The PMP shall include an annual inspection of the VRU by a qualified individual. The resultant report shall be maintained on site and shall be made available during subsequent inspections by the Ohio EPA.
2. The permittee shall collect and record the following information each day:
  - a. The permittee shall maintain the data required by the "AER Daily Log", as submitted to the Ohio EPA on January 7, 1997, on a daily basis (i.e., Monday through Friday). Any subsequent changes to this check sheet shall be mutually agreeable to the Sun Company, Inc. and the Ohio EPA.
  - b. The permittee shall maintain a log or record of operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. Each business day, the operator shall verify that the pilot flame and flame sensor are working during loading operations.
 

The permittee shall record the following information each day:

  - a. descriptions of any failures of the flame detection system and the results of the daily pilot inspections; and
  - b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period and an explanation of any corrective action taken to prevent similar occurrences.

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**V. Testing Requirements**

1. 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 12 months prior to permit renewal during the summer months when the gasoline vapor pressure is highest.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.
  - c. The following test methods and procedures from 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable VOC mass emission rate(s):
 

Method 2A inlet vapor volume  
Method 21 potential leak sources  
Method 25B inlet and outlet VOC concentration  
Subpart XX [60.503(d)] tank truck maximum pressure
  - d. 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.
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. 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 refusal to accept the results of the emission test(s).
 

Personnel from the appropriate Ohio EPA District Office 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 within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0250000432 Emissions Unit ID: J001 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0250000432 Emissions Unit ID: T001 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. 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>
Above Ground Internal Floating Roof Storage Tank	3745-21-09(L)	See Additional Terms and Conditions #2

**2. Additional Terms and Conditions**

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

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information.
  - a. The types of petroleum liquids stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0250000432 Emissions Unit ID: T001 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. 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>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0250000432 Emissions Unit ID: T002 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. 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>
Above Ground Internal Floating Roof Storage Tank	3745-21-09 (L)	See Additional Terms and Conditions #2

**2. Additional Terms and Conditions**

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

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**II. Operational Restrictions**

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information.
  - a. The types of petroleum liquids stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

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**IV. Reporting Requirements**

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**V. Testing Requirements**

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0250000432 Emissions Unit ID: T002 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. 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>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

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**III. Monitoring and/or Record Keeping Requirements**

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**IV. Reporting Requirements**

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**V. Testing Requirements**

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0250000432 Emissions Unit ID: T003 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. 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>
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**Measures**

Above Ground Internal Floating Roof      3745-21-09(L)      See Additional Terms and Conditions #2  
Storage Tank

**2. Additional Terms and Conditions**

- 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 leg supports, and the rim vents, if provided, shall be set open when the roof is being floated off the roof leg supports or it is at the manufacturer's recommended setting.
- c. 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.

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information.
  - a. The types of petroleum liquids stored in the tanks.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0250000432 Emissions Unit ID: T003 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. 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> |
|---|---|--------------------------------------|--|
| 2. <b>Additional Terms and Conditions</b> |   |                                      |  |
| 1.  | None  |                                      |  |

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0250000432 Emissions Unit ID: T004 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **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>
2. <b>Additional Terms and Conditions</b>	Above Ground Internal Floating Roof Storage Tank	3745-21-09(L)	See Additional Terms and Conditions #2
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 leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or it is at the manufacturer's recommended setting.		

- c. 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.

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain records of the following information.
  - a. The types of petroleum liquids stored in the tank.
  - b. The maximum true vapor vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 0250000432 Emissions Unit ID: T004 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. 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>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None