



Environmental
Protection Agency

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

Certified Mail

9/23/2011

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

Greg Moore
Marathon Petroleum Company LP - Brecksville Terminal
539 South Main Street
Office 6692
Findlay, OH 45840

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318082830
Permit Number: P0095168
Permit Type: Renewal
County: Cuyahoga

Dear Permit Holder:

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

| | | |
|--|-----|--|
| Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 122 South Front Street Columbus, Ohio 43215 | and | Cleveland Division of Air Quality 2nd Floor 75 Erieview Plaza Cleveland, OH 44114 |
|--|-----|--|

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Marathon Petroleum – Brecksville Terminal receives a variety of fuels, including various grades of gasoline, transmix, and distillate fuels via pipeline. The fuels are then stored in bulk storage tanks, until transferred to cargo tank trucks via loading rack. The facility operates a loading rack (J001) and various storage tanks both permitted and exempt.

3. Facility Emissions and Attainment Status:

Facility actual VOC emissions reported for 2010 were 23.36 tons.

The facility's potential to emit for volatile organic compounds (VOC), any individual hazardous air (HAP), and combined HAPs is above the Title V thresholds. Marathon Petroleum - Brecksville Terminal has proposed to limit the annual throughput of gasoline/transmix and distillates (processed through the loading rack (J001)) to 676,500,000 gallons and 100,000,000 gallons, respectively. The throughput restriction will limit the facility's VOC emissions to less than 99.5 tons per year, individual HAP emissions to 9.8 tons per year, and combined HAP emissions to 24.5 tons per year.

Cuyahoga County is currently in non-attainment for PM 2.5.

4. Source Emissions:

The facility has requested a federally enforceable throughput limitation of 676,500,000 gallons gasoline/transmix and 100,000,000 gallons distillates per year, and 99.5 TPY facility-wide VOC limit. All fuel storage tanks are connected to the loading rack which is controlled by a vapor recovery unit. The throughput limitation at the loading rack creates a "bottleneck" thus limiting the emissions generated by the storage tanks. J001's allowable VOC emission rate is 71.11 tons of VOC per year. The remaining 28.39 tons of VOC will be allocated to all other VOC emitting sources (storage tanks and de minimis units) located at the facility.

5. Conclusion:

The PTE for VOC, individual HAP, and combined HAPs has been restricted below Title V and MACT applicability thresholds with the federally enforceable annual throughput limitation of 676,500,000 gallons gasoline/transmix and 100,000,000 gallons distillates. Provided that Marathon - Brecksville terminal maintains compliance with the terms and conditions for J001, all storage tanks and associated VOC emitting sources, the facility will not be subject to Title V permitting. Monthly record keeping of fuel throughput is required.

6. Please provide additional notes or comments as necessary:

Marathon will employ a portable flare solely as a temporary back-up control unit in the event that the VRU should malfunction or be out of service for repair. The facility may load no more than 57.5 million



gallons of gasoline/transmix (yielding 4.8 tons VOC emissions per year) and no more than 44 million gallons of distillates (yielding 3.67 tons per year VOC) while utilizing the flare annually. The facility states that the flare will likely never be used, but they would like to have it on hand and included in the FEPTIO in the event of an emergency.

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

| Pollutant | Tons Per Year |
|------------------|----------------------|
| VOC | 99.5 |
| Individual HAP | 9.8 |
| Combined HAP | 24.5 |

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Marathon Petroleum Company LP - Brecksville Terminal

Issue Date: 9/23/2011

Permit Number: P0095168

Permit Type: Renewal

Permit Description: Renewal FEPTIO for one (1) petroleum products loading rack (J001) and twelve (10) storage tanks (T001 - T004, T006, T007, T010 - T012 and T018. Emissions from the loading rack and storage tanks are controlled by a vapor recovery unit (VRU). Renewed terms for the gasoline loading rack equipped with VRU and ten storage tanks. J001 previously permitted under PTI 13-0601 (issued 9/19/1980) T001 previously permitted under PTO P0058079 (issued 2/5/1993) T002 previously permitted under PTO P0058080 (issued 3/31/1992) T003 previously permitted under PTO P0058081 (issued 3/31/1992) T004 previously permitted under PTO P0058082 (issued 3/31/1992) T006 previously permitted under PTI 13-2469 (issued 6/17/1992) T007 previously permitted under PTO P0058085 (issued 2/5/1993) T010, T011, and T012 previously permitted under PTI 13-0601 (issued 9/19/1980) T018 previously permitted under PTI 13-2468 (issued 4/15/1992)

Facility ID: 1318082830

Facility Location: Marathon Petroleum Company LP - Brecksville Terminal
10439 BRECKSVILLE RD.,
Brecksville, OH 44141

Facility Description: Petroleum Bulk Stations and Terminals

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erievue Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

Marathon Petroleum Company LP - Brecksville Terminal

| | |
|----------------|-----------------------------------|
| Facility ID: | 1318082830 |
| Permit Number: | P0095168 |
| Permit Type: | Renewal |
| Issued: | 9/23/2011 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



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

Table of Contents

Authorization 1
A. Standard Terms and Conditions 4
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 5
2. Who is responsible for complying with this permit? 5
3. What records must I keep under this permit? 5
4. What are my permit fees and when do I pay them?..... 5
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 6
7. What reports must I submit under this permit? 6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 7
13. Can I transfer this permit to a new owner or operator?..... 8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 8
15. What happens if a portion of this permit is determined to be invalid? 8
B. Facility-Wide Terms and Conditions..... 9
C. Emissions Unit Terms and Conditions 15
1. J001, Loading Racks/VRU 16
2. T001, Tank 55-3..... 29
3. T002, Tank 35-1..... 31
4. T003, Tank 35-9..... 33
5. T004, Tank 55-12..... 35
6. T006, Tank 15-11..... 38
7. T007, Tank T-5 42
8. T010, Tank 80-4..... 44
9. T011, Tank 80-6..... 47

| | |
|-----------------------------|----|
| 10. T012, Tank 35-2..... | 50 |
| 11. T018, Tank AA-10-2..... | 53 |



Authorization

Facility ID: 1318082830
Application Number(s): A0026693
Permit Number: P0095168
Permit Description: Renewal FEPTIO for one (1) petroleum products loading rack (J001) and twelve (10) storage tanks (T001 - T004, T006, T007, T010 - T012 and T018. Emissions from the loading rack and storage tanks are controlled by a vapor recovery unit (VRU). Renewed terms for the gasoline loading rack equipped with VRU and ten storage tanks. J001 previously permitted under PTI 13-0601 (issued 9/19/1980) T001 previously permitted under PTO P0058079 (issued 2/5/1993) T002 previously permitted under PTO P0058080 (issued 3/31/1992) T003 previously permitted under PTO P0058081 (issued 3/31/1992) T004 previously permitted under PTO P0058082 (issued 3/31/1992) T006 previously permitted under PTI 13-2469 (issued 6/17/1992) T007 previously permitted under PTO P0058085 (issued 2/5/1993) T010, T011, and T012 previously permitted under PTI 13-0601 (issued 9/19/1980) T018 previously permitted under PTI 13-2468 (issued 4/15/1992)
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/23/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Marathon Petroleum Company LP - Brecksville Terminal
10439 BRECKSVILLE RD.
Brecksville, OH 44141

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

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

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0095168

Permit Description: Renewal FEPTIO for one (1) petroleum products loading rack (J001) and twelve (10) storage tanks (T001 - T004, T006, T007, T010 - T012 and T018). Emissions from the loading rack and storage tanks are controlled by a vapor recovery unit (VRU). Renewed terms for the gasoline loading rack equipped with VRU and ten storage tanks. J001 previously permitted under PTI 13-0601 (issued 9/19/1980) T001 previously permitted under PTO P0058079 (issued 2/5/1993) T002 previously permitted under PTO P0058080 (issued 3/31/1992) T003 previously permitted under PTO P0058081 (issued 3/31/1992) T004 previously permitted under PTO P0058082 (issued 3/31/1992) T006 previously permitted under PTI 13-2469 (issued 6/17/1992) T007 previously permitted under PTO P0058085 (issued 2/5/1993) T010, T011, and T012 previously permitted under PTI 13-0601 (issued 9/19/1980) T018 previously permitted under PTI 13-2468 (issued 4/15/1992)

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

- Emissions Unit ID: J001
Company Equipment ID: Loading Racks/VRU
Superseded Permit Number: 13-601
General Permit Category and Type: Not Applicable
Emissions Unit ID: T001
Company Equipment ID: Tank 55-3
Superseded Permit Number: P0058079
General Permit Category and Type: Not Applicable
Emissions Unit ID: T002
Company Equipment ID: Tank 35-1
Superseded Permit Number: P0058080
General Permit Category and Type: Not Applicable
Emissions Unit ID: T003
Company Equipment ID: Tank 35-9
Superseded Permit Number: P0058081
General Permit Category and Type: Not Applicable
Emissions Unit ID: T004
Company Equipment ID: Tank 55-12
Superseded Permit Number: P0058082
General Permit Category and Type: Not Applicable
Emissions Unit ID: T006
Company Equipment ID: Tank 15-11
Superseded Permit Number: 13-2469
General Permit Category and Type: Not Applicable
Emissions Unit ID: T007
Company Equipment ID: Tank T-5
Superseded Permit Number: P0058085
General Permit Category and Type: Not Applicable

Emissions Unit ID: T010
Company Equipment ID: Tank 80-4
Superseded Permit Number: 13-601
General Permit Category and Type: Not Applicable

Emissions Unit ID: T011
Company Equipment ID: Tank 80-6
Superseded Permit Number: 13-601
General Permit Category and Type: Not Applicable

Emissions Unit ID: T012
Company Equipment ID: Tank 35-2
Superseded Permit Number: 13-601
General Permit Category and Type: Not Applicable

Emissions Unit ID: T018
Company Equipment ID: Tank AA-10-2
Superseded Permit Number: 13-2468
General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(2) b), c), d), e), f) and g)

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(D) FEPTIO to avoid Title V and MACT Applicability | See b)(2)a. |

(2) Additional Terms and Conditions

a. The total combined annual emissions from all facility emissions units, including permit to install and operate exempt and "de minimis" emissions units, shall not exceed the following as rolling, 12- month summations:

- i. 99.5 tons of volatile organic compounds (VOC);
- ii. 24.5 tons of combined hazardous air pollutants (HAPs); and
- iii. 9.8 tons of individual HAP.

c) Operational Restrictions

(1) None.

d) Monitoring and Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the calculated, total VOC and HAP (individual and combined HAPs) emissions (in tons), and;
 - b. the rolling, 12-month summations of VOC and HAP (individual and combined HAPs) emissions (in tons) from gasoline/transmix and distillates for all emission units at the facility, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month VOC emission limitation of 99.5 tons;
 - ii. the rolling, 12-month individual HAP emissions limitation of 9.8 tons; and
 - iii. the rolling, 12-month combined HAPs emissions limitation of 24.5 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality (CDAQ).

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

99.5 tons per year of VOC as a rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to d)(1) above.

In order to calculate the VOC emission rates, the permittee shall employ the following:

- i. VOC emissions from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program.
- ii. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- iii. VOC emissions from storage tank roof landings shall be determined using AP-42, Fifth Edition, Section 7.1.3.2.2 Equation (2-10).

The VOC emissions from gasoline truck loading shall be determined, using AP- 42, Fifth Edition, Section 5.2, Equation (1), dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 99 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

b. Emission Limitations:

24.5 tons of combined HAPs per rolling, 12-month summation from all facility emissions units

9.8 tons of any individual HAP per rolling, 12-month summation from all facility emissions units

Applicable Compliance Method:

Compliance with these emission limitations shall be based upon the records required pursuant to d)(1) above.

To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in b)(2)a., the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline.

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

- i. benzene - 0.009 pound of benzene emissions per pound of VOC emissions;
- ii. toluene - 0.013 pound of toluene emissions per pound of VOC emissions;
- iii. xylene - 0.005 pound of xylene emissions per pound of VOC emissions;
- iv. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
- v. hexane - 0.016 pound hexane emissions per pound of VOC emissions,
- vi. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions.

To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

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, the CDAQ and the permittee.

g) Miscellaneous Requirements

- (1) The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>

- (2) The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart XX: J001

The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart K: T010, T011, and T012

The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb: T006

The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality.



The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart XX, Subpart K, and Subpart Kb. Compliance with all applicable requirements shall be achieved by the dates set forth in the respective subparts.

C. Emissions Unit Terms and Conditions



1. J001, Loading Racks/VRU

Operations, Property and/or Equipment Description:

Bottom Loading Racks (4) equipped with a vapor recovery unit (VRU)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V and MACT applicability. Gasoline and Transmix Loading Controlled by Vapor Recovery Unit (VRU): 0.083 pound of VOC per 1,000 gallons (10.0 mg/l) of gasoline loaded into the delivery vessel and 28.07 tons of VOC per year (TPY). Gasoline and Transmix Loading Controlled by Portable Backup Flare: 0.167 pound of VOC per 1,000 gallons (20 mg/l) of gasoline loaded into the delivery vessel and 4.80 tons of VOC per year (TPY). Distillate Loading (diesel fuels, fuel oils, and kerosene) Controlled by Vapor Recovery Unit (VRU):



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| | | <p>0.014 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel and 0.7 tons of VOC per year.</p> <p><u>Distillate Loading (diesel fuels, fuel oils, and kerosene) Controlled by Portable Backup Flare:</u></p> <p>0.167 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel and 3.67 tons of VOC per year.</p> <p><u>Tank Truck Fugitive Losses:</u></p> <p>0.108 pound of VOC per 1,000 gallons of gasoline and transmix loaded into the delivery vessel and 36.53 tons of VOC per year.</p> <p>0.00051 pound of VOC per 1,000 gallons of distillate loaded into the delivery vessel and 0.03 tons of VOC per year.</p> <p>The total annual VOC emissions from this emissions unit shall not exceed 71.11 TPY.</p> <p>See c)(1).</p> |
| b. | OAC rule 3745-21-09(Q) | <p>The VOC emission limitation specified by this rule is less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31 05(D)(1)(b).</p> <p>See c)(2) through (7); d)(5) and (6); and e)(3).</p> |
| c. | <p>40 CFR Part 60, Subpart XX (40 CFR 60.500 – 506)</p> <p>[In accordance with 40 CFR 60.500, this emission unit is a loading rack at a bulk gasoline terminal which is subject to the emissions limitations and/or control measures specified in this section.]</p> | See c)(10), d)(8), f)(4), and g)(2). |

(2) Additional Terms and Conditions

- a. None.

c) Operational Restrictions

- (1) Compliance with the emission limitations as specified in b)(1)a. shall be achieved by restricting the annual throughput of refined petroleum products based upon a rolling, 12-month summation of the following amounts:
 - a. The annual combined throughput of gasoline and transmix shall not exceed 676,500,000 gallons, but no more than 57,500,000 gallons of the total throughput shall be processed using the portable backup flare control device; and
 - b. the annual throughput of distillates shall not exceed 100,000,000 gallons, but no more than 44,000,000 gallons of the total throughput shall be processed using the portable backup flare control device.
- (2) The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:
 - a. all vapors displaced from the gasoline delivery vessel during loading are vented only to the vapor collection system; and
 - b. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
- (3) The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system;
 - b. 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
 - c. 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.
- (4) 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.
- (5) All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
- (6) 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.
- (7) The permittee shall repair any leak from the vapor collection system or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

- (8) 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 F;
 - c. to ensure a proper flow rate from the absorption tower to the carbon bed, a positive absorber pressure shall be maintained; and
 - d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 200 degrees F.

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.

- (9) While utilizing the portable backup flare control device, a pilot flame shall be maintained at all times in the flare's pilot light burner.
- (10) The permittee shall comply with the applicable standards for volatile organic compound (VOC) emissions required under 40 CFR Part 60, Subpart XX, including the following sections:

| | |
|-----------|--|
| 60.502(a) | Subject facility shall be equipped with a vapor collection system |
| 60.502(b) | Organic compound limit from the vapor collection system |
| 60.502(c) | Emission limitation for existing vapor processing systems |
| 60.502(d) | Vapors collected from one loading rack are not permitted to pass through to another loading rack |
| 60.502(e) | Procedures for loading gasoline into vapor-tight tank trucks |
| 60.502(f) | Compatibility of vapor collection equipment with tank truck equipment |
| 60.502(g) | Procedures to ensure proper connection of vapor collection system |



Table with 2 columns: Code (60.502(h), 60.502(i)) and Description (Gauge pressure requirements, Activation of pressure-vacuum vent)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the gasoline and transmix throughput rates, in gallons, for each month;
b. the distillate oil throughput rate, in gallons for each month;
c. the gasoline, transmix, and distillate throughput rate when utilizing the portable backup flare control device, in gallons, for each month; itemized by fuel type;
d. the updated rolling, 12-month summation of the gasoline, transmix, and distillate oil throughput rates, in gallons; itemized by fuel type;
e. the updated rolling, 12-month summation of the gasoline, transmix, and distillate throughput rate when utilizing the portable backup flare control device, in gallons; itemized by fuel type;
f. the updated rolling, 12-month summation of the actual VOC emissions from the VRU, in tons, for each month. This shall include the information for the current month and the preceding eleven months:

[[the actual gasoline throughput rate from d)(1)d. (gallons gasoline and transmix loaded when utilizing the VRU/rolling, 12-month period) x emission factor (lbs of VOC/gallon gasoline and transmix loaded when utilizing the VRU)] + [the actual distillate oil throughput rate from d)(1)d. (gallons distillate oil loaded/rolling, 12-month period) x emission factor (lbs of VOC/gallon distillate oil loaded)]] x 1 Ton/2000 lbs = Tons of VOC/rolling, 12-month period; and

- g. the updated rolling, 12-month summation of the actual VOC emissions from the portable backup flare control device, in tons, for each month. This shall include the information for the current month and the preceding eleven months:

[the actual gasoline throughput rate when utilizing the portable backup flare control device from d)(1)e. (gallons gasoline and transmix loaded when utilizing the portable backup flare control device/rolling, 12-month period) x emission factor (lbs of VOC/gallon gasoline and transmix loaded when utilizing the portable backup flare control device)] + [the actual distillate oil throughput rate from d)(1)e. (gallons distillate oil loaded/rolling, 12-month period) x emission factor (lbs of VOC/gallon distillate oil loaded)]] x 1 Ton/2000 lbs = Tons of VOC/rolling, 12-month period.

- (2) The permittee shall comply with, a preventive maintenance program (PMP) for the vapor recovery unit which has been approved by the Cleveland Division of Air Quality (CDAQ). 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 CDAQ.
- (3) The permittee shall maintain the data required by the vapor recovery unit manufacturers' recommended daily operating guidelines. Any subsequent changes to the guidelines shall be mutually agreeable to the permittee and the CDAQ.
- (4) The permittee shall collect and record the following information for each day for the control equipment:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation;
 - b. during the regeneration cycle, the vacuum pressure in inches of Hg;
 - c. the gasoline supply temperature in degrees F;
 - d. the absorber pressure in psi; and
 - e. the carbon bed temperatures in degrees F.
- (5) The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in OAC rule 3745-21-09(Q)(1)(a)(ii). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (6) The permittee shall repair any leak from the vapor collection system and/or vapor control system, that is equal to or greater than 100% of the LEL as propane (as determined under OAC 3745-21-10(K)), within 15 days of detection. The permittee shall maintain a record of each such leak that is not repaired within the 15 days.
- (7) The permittee shall monitor the portable backup flare control device when in use to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.
- (8) The permittee shall comply with the applicable record keeping requirements required under 40 CFR Part 60, Subpart XX, including the following sections:

| | |
|-----------|---|
| 60.502(j) | Acceptable monthly vapor collection, processing, and loading rack system inspection methods |
| 60.505(a) | Duration of vapor tightness documentation record retention |
| 60.505(b) | Updating gasoline tank truck documentation according to Method |



Table with 2 columns: Requirement ID, Requirement Description. Rows include 60.505(c) Retention of monthly leak inspection records, 60.505(d) Retention of notification documentation, 60.505(e) Record keeping alternatives, 60.505(f) Record keeping for replacements or additions of components.

(9) When utilizing the portable backup flare to control VOC emissions, 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 and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
i. the rolling, 12-month limitations on the throughput of gasoline, transmix and distillates;
ii. any exceedance of the allowable rolling, 12-month throughput amounts while utilizing the portable backup flare; and
iii. the rolling, 12-month emission limitation for VOC.
b. the probable cause of each deviation (excursion);
c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Any leaks in the vapor collection system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that are not repaired within 15 days after identification, shall be reported to the CDAQ within 30 days after the repair is completed. This report shall include the date the leak was detected and the date the leak was repaired.
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):
 - Emission limitations when controlled by the VRU:
 - a. Emission Limitations:
0.083 pound of VOC per 1,000 gallons of gasoline and transmix loaded
Applicable Compliance Method:
Compliance shall be demonstrated through emission testing procedures identified in f)(2).
 - b. Emission Limitations:
28.07 tons of VOC per year from gasoline and transmix loading
Applicable Compliance Method:
The actual annual emissions shall be calculated as the product of the VOC emission rate from the last compliant emission test (in pound of VOC per 1,000 gallons of gasoline and transmix loaded) times the gallons of gasoline and transmix loaded during the year and divided by 2000 pounds.
 - c. Emission Limitation:
0.014 pound of VOC per 1,000 gallons of distillates loaded

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon emission factors from AP-42, 5th Edition, Table 5.2-5 of 0.014 pound of VOC per 1,000 gallons of distillate.

d. Emission Limitation:

0.7 ton of VOC per year from distillates loading

Applicable Compliance Method:

The actual annual emissions shall be calculated as the product of 0.014 pound of VOC per 1,000 gallons times the total gallons of distillates loaded during the year, divided by 2,000, and 0.014 pound VOC per 1,000 gallons times the total gallons of diesel oil loaded during the year and divided by 2,000.

Emission limitations when controlled by portable backup flare:

e. Emission Limitations:

0.167 pound of VOC per 1,000 gallons of gasoline and transmix loaded

Applicable Compliance Method:

Compliance shall be demonstrated through emission testing procedures identified in f)(2).

f. Emission Limitations:

4.80 tons of VOC per year from gasoline and transmix loading

Applicable Compliance Method:

The actual annual emissions shall be calculated as the product of the VOC emission rate from the last compliant emission test (in pound of VOC per 1,000 gallons of gasoline and transmix loaded) times the gallons of gasoline and transmix loaded during the year and divided by 2000 pounds.

g. Emission Limitation:

0.167 pound of VOC per 1,000 gallons of distillates loaded

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon emission factors from AP-42, 5th Edition, Table 5.2-5 of 0.016 pound VOC per 1,000 gallons of diesel.

h. Emission Limitation:

3.67 tons of VOC per year from distillates loading

Applicable Compliance Method:

The actual annual emissions shall be calculated as the product of 0.167 pound of VOC per 1,000 gallons times the total gallons of distillates loaded during the year, divided by 2,000.

Emission limitations for fugitive tank truck emissions:

i. Emission Limitation:

0.108 pound of VOC per 1,000 gallons as from tank truck fugitive losses when loading gasoline and transmix

Applicable Compliance Method:

The VOC emissions from gasoline tank trucks loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 13 mg/l from the trucks.

The 13 mg/l leakage emission factor is calculated using 1.3% as the average leakage from a truck passing the 3-inch pressure decay test (EPA-453/R- 94-002b, "Gasoline Distribution Industry (Stage I) - Background Information for Promulgated Standards", Appendix A, November 1994).

The VOC emissions from gasoline and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

j. Emission Limitation:

36.53 tons of VOC per year from tank truck fugitive losses when loading gasoline and transmix

Applicable Compliance Method:

The actual annual emissions shall be calculated as the product of 0.108 pound of VOC per 1,000 gallons times the total gallons of liquids loaded during the year, divided by 2,000 lbs.

k. Emission Limitation:

0.00051 pound of VOC per 1,000 gallons as from tank truck fugitive losses when loading distillates

Applicable Compliance Method:

The VOC emissions from gasoline tank trucks loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 0.06 mg/l from the trucks.

The VOC emissions from distillates loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

I. Emission Limitation:

0.03 tons of VOC per year from tank truck fugitive losses when loading distillates

Applicable Compliance Method:

The actual annual emissions shall be calculated as the product of 0.00051 pound of VOC per 1,000 gallons times the total gallons of distillates loaded during the year, divided by 2,000 lbs.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to the permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 2A of 40 CFR Part 60, Appendix A

Method 21 of 40 CFR Part 60, Appendix A

Method 25B of 40 CFR Part 60, Appendix A

Method 205 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity between the calendar months of May and September, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ).
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).

- f. Personnel from the CDAQ 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.
g. 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 CDAQ within 30 days following completion of the test(s).

- (3) The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded.
(4) The permittee shall comply with the applicable test methods and procedures required under 40 CFR Part 60, Subpart XX, including the following sections:

Table with 2 columns: Section ID (e.g., 60.503(a)) and Description (e.g., Performance test requirements)

g) Miscellaneous Requirements

- (1) This emission unit was initially installed 6/1/1979 and modified after 12/17/1980.
(2) The permittee shall comply with the applicable reconstruction requirements under 40 CFR Part 60, Subpart XX, including the following sections:

Table with 2 columns: Section ID (e.g., 60.506(a)) and Description (e.g., Cost requirements)

- (3) VOC emission loading loss equation AP-42, 5th Edition, Equation 5.2-1:

$$L_L = 12.46 * (S * P * M) / T$$

where:

L_L = loading loss, pounds per 1000 gallons (lb/10³ gal) of liquid loaded

S = a saturation factor (see Table 5.2-1)

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia)
(see Section 7.1, "Organic Liquid Storage Tanks")

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see
Section 7.1, "Organic Liquid Storage Tanks")

T = temperature of bulk liquid loaded, °R (°F + 460)



2. T001, Tank 55-3

Operations, Property and/or Equipment Description:

(55-3) 55,000 barrel (2,310,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-21-09(L), See Sections c), d), and e)(1)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

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

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

- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
- d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

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

e) **Reporting Requirements**

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) None.

g) **Miscellaneous Requirements**

- (1) This emission unit was installed in 1959.
- (2) An internal floating roof was installed on this emission unit in 1982.



3. T002, Tank 35-1

Operations, Property and/or Equipment Description:

(35-1) 35,000 barrel (1,470,000 gallon) fuel storage tank equipped with an internal floating roof, primary mechanical shoe, and secondary wiper seals

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-21-09(L), See Sections c), d), and e)(1)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

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

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

- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
 - d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
 - (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
 - e) **Reporting Requirements**
 - (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - f) **Testing Requirements**
 - (1) None.
 - g) **Miscellaneous Requirements**
 - (1) This emission unit was installed in 1959.



4. T003, Tank 35-9

Operations, Property and/or Equipment Description:

(35-9) 35,000 barrel (1,470,000 gallons) fixed roof fuel storage tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Identifier, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-21-09(L)(1), (3), and (4) with corresponding references to sections b)(2)a, d)(1), and e)(1).

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

e) Reporting Requirements

- (1) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1959.



5. T004, Tank 55-12

Operations, Property and/or Equipment Description:

(55-12) 55,000 barrel (2,310,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-21-07(K)(2), OAC rule 3745-21-07(K)(3), and OAC rule 3745-21-09(L).

(2) Additional Terms and Conditions

a. The permittee shall not place, store or hold any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with one of the following vapor loss control equipment:

i. The storage tank shall be equipped with a floating pontoon or double-deck type cover that includes closure seals to enclose any space between the cover's edge and the compartment wall.

This control requirement shall not be permitted if the liquid organic material in the tank has a vapor pressure of 12.5 pounds per square inch absolute or greater under actual storage conditions.

- ii. The storage tank shall be equipped with a vapor recovery system or control system that reduces the emission of organic compounds into the atmosphere by at least ninety per cent by weight.

All tank gauging or sampling devices shall be gas tight except when tank gauging or sampling is taking place.

- b. No person shall place, store or hold in any storage tank identified in paragraph (K)(3) of this rule, any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with a permanent submerged fill pipe, or is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is fitted with a vapor recovery system as described in paragraph (K)(2)(b) of OAC rule 3745-21-07(K).

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
 - a. The storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

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

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1971.



6. T006, Tank 15-11

Operations, Property and/or Equipment Description:

(15-11) 15,000 barrel (630,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Applicability, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists three rows of requirements and measures for the tank.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: control measures specified in this section.]

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) to control VOC emissions from the unit has been determined to be a submerged filling system and internal floating roof with mechanical shoe seal.
b. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: 60.112b(a), Equipping the storage vessel with vapor control devices

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
a. The storage tank shall be equipped with an internal floating roof.
b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
a. the types of petroleum liquids stored in the tank; and
b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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



- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
(3) The permittee shall comply with the monitoring required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: Regulation ID and Description. Rows include 60.116b (a) Copies of all records required by this section, 60.116b (b) Records of the storage vessel's dimensions and capacity analysis, and 60.116b (e) Vapor pressure determination methods.

- (4) The permittee shall comply with the recordkeeping required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: Regulation ID and Description. Rows include 60.115b (a)(2) Records of inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4), and 60.116b (c) Maintain records of the VOL stored, period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
(4) The permittee shall comply with the reporting requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: Regulation ID and Description. Row includes 60.115b (a)(1) Certification of control equipment meeting the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).



Table with 2 columns: Reference Code, Description. Rows include 60.115b (a)(3), 60.115b (a)(4), and 60.116b (e).

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

Volatile Organic emissions shall not exceed 1.80 pounds per hour

Volatile Organic emissions shall not exceed 2.25 TPY

Applicable Compliance Method:

VOC emissions from this storage tank shall be determined using the most recent version of USEPA's "Tanks" program.

(2) The permittee shall comply with the testing and procedures requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: Reference Code, Description. Row includes 60.113b(a) and Inspection of control equipment meeting the requirements of §60.112b

g) Miscellaneous Requirements

(1) The permittee shall comply with the alternative means of emission limitation required under 40 CFR Part 60, Subpart Kb, including the following sections:

Table with 2 columns: Reference Code, Description. Row includes 60.114b and Notification of alternative means of emission limitation

(2) This emission unit was installed in 1959.

(3) This emission unit was equipped with an internal floating roof and submerged filling system in 1992. PTI #13-02469 was issued 6/17/1992 for this modification.



7. T007, Tank T-5

Operations, Property and/or Equipment Description:

(T-5) 885 barrel (37,170 gallons) fuel storage tank (fixed cone roof) equipped with an internal floating roof (covered floater) and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | None | None |

(2) Additional Terms and Conditions

a. There are no rules which are applicable to this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

- f) Testing Requirements
 - a. None
- g) Miscellaneous Requirements
 - (1) This emission unit was installed in 1959.
 - (2) A PTI has never been issued for this emission unit.
 - (3) An internal floating roof was installed on this emission unit 9/2002.
 - (4) Installation of the internal floating roof in 2002 does not meet the definition of a modification as specified by 40 CFR Part 60 Subpart A.



8. T010, Tank 80-4

Operations, Property and/or Equipment Description:

(80-4) 80,000 barrel (3,360,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-21-09(L), See Sections c), d)(1)-(2), and e)(1). Row b: 40 CFR Part 60 Subpart K (40 CFR 60.110-113), See Section b)(2)a. and d)(3). Includes narrative for row b: [In accordance with 40 CFR 60.110, this emission unit is a storage vessel for petroleum liquids for which construction commenced after June 11, 1973, and prior to May 19, 1978 which is subject to the emissions limitations and/or control measures specified in this section.]



(2) Additional Terms and Conditions

- a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following sections:

Table with 2 columns: Reference code and Description. Row 1: 60.112(a)(1) Installation of vapor control devices based on vapor pressure. Row 2: 60.112(a)(2) Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

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

- a. The storage tank shall be equipped with an internal floating roof.
b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
a. the types of petroleum liquids stored in the tank; and
b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

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

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

Table with 2 columns: Reference code and Description. Row 1: 60.113(a) Recordkeeping for the storage of petroleum



| | |
|-----------|---|
| 60.113(b) | Using Reid vapor pressure for crude oil |
| 60.113(c) | Recording vapor pressure for crude oil |
| 60.113(d) | Exemptions |

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1977.



9. T011, Tank 80-6

Operations, Property and/or Equipment Description:

(80-6) 80,000 barrel (3,360,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-21-09(L) / See Sections c), d)(1)-(2), and e)(1). Row b: 40 CFR Part 60 Subpart K / See Section b)(2)a. and d)(3). Includes detailed text for row b regarding storage vessel construction dates.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following section:



Table with 2 columns: Code and Description. Row 1: 60.112(a)(1) Installation of vapor control devices based on vapor pressure. Row 2: 60.112(a)(2) Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
a. The storage tank shall be equipped with an internal floating roof.
b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
a. the types of petroleum liquids stored in the tank; and
b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
(3) The permittee shall comply with the applicable monitoring requirements under 40 CFR Part 60, Subpart K, including the following sections:

Table with 2 columns: Code and Description. Row 1: 60.113(a) Recordkeeping for the storage of petroleum. Row 2: 60.113(b) Using Reid vapor pressure for crude oil. Row 3: 60.113(c) Recording vapor pressure for crude oil. Row 4: 60.113(d) Exemptions.



e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1977.



10. T012, Tank 35-2

Operations, Property and/or Equipment Description:

(35-2) 35,000 barrel (1,470,000 gallons) fuel storage tank equipped with an internal floating roof and primary mechanical shoe seal

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-21-09(L), See Sections c), d)(1)-(2), and e)(1). Row b: 40 CFR Part 60 Subpart K, See Section b)(2)a. and d)(3). Includes a detailed note for row b regarding construction dates and emissions limitations.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable general requirements required under 40 CFR Part 60, Subpart K, including the following section:



Table with 2 columns: Code and Description. Row 1: 60.112(a)(1) Installation of vapor control devices based on vapor pressure. Row 2: 60.112(a)(2) Vapor recovery system requirement based on vapor pressure.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
a. The storage tank shall be equipped with an internal floating roof.
b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the storage tank:
a. the types of petroleum liquids stored in the tank; and
b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

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

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
(3) The permittee shall comply with the applicable monitoring requirements under 40 CFR Part 60, Subpart K, including the following sections:

Table with 2 columns: Code and Description. Row 1: 60.113(a) Recordkeeping for the storage of petroleum. Row 2: 60.113(b) Using Reid vapor pressure for crude oil. Row 3: 60.113(c) Recording vapor pressure for crude oil. Row 4: 60.113(d) Exemptions.



e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (CDAQ) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) This emission unit was installed in 1976.



11. T018, Tank AA-10-2

Operations, Property and/or Equipment Description:

(AA-10-2) 10,000 gal storage tank equipped with a vertical (cone) fixed roof tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | OAC rule 3745-31-05(A)(3)(c) | <p>Volatile Organic Compound (VOC) emissions shall not exceed 2.30 pounds per hour and 0.75 tons per year (TPY).</p> <p>See b)(2)a.</p> |
| b. | OAC rule 3745-21-07(K)(3) | See b)(2)b. |

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) to control VOC emissions from the unit has been determined to a submerged fill pipe.

b. No person shall place, store or hold in any storage tank identified in paragraph (K)(3) of this rule, any liquid organic material that has a vapor pressure of 1.5 pounds per square inch absolute or greater, under actual storage conditions, unless the storage tank is equipped with a permanent submerged fill pipe, or is

loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is fitted with a vapor recovery system as described in paragraph (K)(2)(b) of OAC rule 3745-21-07(K).

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
 - (1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Volatile Organic emissions shall not exceed 2.30 pounds per hour
Volatile Organic emissions shall not exceed 0.75 TPY

Applicable Compliance Method:
VOC emissions from this storage tank shall be determined using the most recent version of USEPA's "Tanks" program.
- g) Miscellaneous Requirements
 - (1) This emission unit was installed in 1991.