Facility ID: 0448020080 Issuance type: Title V Final Permit

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

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

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

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Facility ID: 0448020080 Issuance type: Title V Final Permit

Part II - Specific Facility Terms and Conditions

a **State and Federally Enforceable Section**

1. None

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Facility ID: 0448020080 Issuance type: Title V Final Permit

b **State Only Enforceable Section**

1. None

Go to Part III for Emissions Unit P001
Go to Part III for Emissions Unit T105
Go to Part III for Emissions Unit T106
Go to Part III for Emissions Unit T108
Go to Part III for Emissions Unit T143
Go to Part III for Emissions Unit T144
Go to Part III for Emissions Unit T145
Go to Part III for Emissions Unit T146

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Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: P001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
wastewater treatment system - using carbon adsorption as the control equipment	OAC rule 3745-31-05(A)(3) (PTI 04-718)	11.15 lbs/hr of volatile organic compounds (VOC) and 48.8 tpy of VOC from the dissolved nitrogen flotation unit 5.70 lbs/hr of VOC and 24.97 tpy of VOC from the activated sludge system
	40 CFR Part 61, Subpart FF	See A.I.2.a, A.I.2.d, and A.I.2.e below.
	OAC rule 3745-21-09(M)	See A.I.2.c below.
	40 CFR Part 60, Subpart GGG	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. The permittee currently employs carbon adsorption as the control equipment; however, the permittee has the option of employing any of the control equipment listed in 40 CFR Part 61, Subpart FF and, as such, would be responsible for any associated monitoring, record keeping, reporting and/or testing requirements. Should a change in control equipment occur, the permittee shall notify the Toledo Division of Environmental Services within 30 days after installation.

b. The permittee shall comply with the requirements of 40 CFR Part 60, Subpart VV for the compressors on the dissolved nitrogen flotation unit, pursuant to 40 CFR 60.592(a).

c. Except for any wastewater separator which is used solely for once-through, noncontact cooling water or for intermittent tank farm drainage resulting from accumulated precipitation, the permittee shall control the emissions of VOC from any wastewater separator by equipping all forebay sections and other separator sections with covers and seals which minimize the amount of oily water exposed to the ambient air. In addition, all covers and forebay and separator sections shall be equipped with lids and seals which are kept in a closed position at all times except when in actual use.

d. GENERAL STANDARDS
[61.342(c)(1)]
For each waste stream that contains benzene, including (but not limited to) organic waste streams that contain less than 10 percent water and aqueous waste streams, even if the wastes are not discharged to an individual drain system, the permittee shall:

[61.342(c)(1)(i)]
i. Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348 [see section A.I.2. (Standards for Treatment Processes)].

[61.342(c)(1)(ii)]
ii. Comply with the standards specified in 40 CFR 61.343 through 61.347 [see sections A.I.2. and

A.III.] for each waste management unit that receives or manages the waste stream prior to and during treatment of the waste stream in accordance with section A.I.2.a.

e. [61.342(c)(2)]
A waste stream is exempt from 40 CFR 61.342(c)(1) [see section A.I.2.] provided that the permittee demonstrates initially and, thereafter, at least once per year that the flow-weighted annual average benzene concentration for the waste stream is less than 10 ppmw as determined by the procedures specified in 40 CFR 61.355(c)(2) or 40 CFR 61.355(c)(3) [see section A.V.].

f. STANDARDS: INDIVIDUAL DRAIN SYSTEMS
[61.346(a)]
Except as provided in 40 CFR 61.346(b) [see section A.I.2.], the permittee shall meet the following standards for each individual drain system in which waste is placed in accordance with 40 CFR 61.342(c)(1)(ii) [see section A.I.2.]:

[61.346(a)(1)]
i. The permittee shall install, operate, and maintain on each drain system opening a cover and closed-vent system that routes all organic vapors vented from the drain system to a control device.

i.(a) The cover shall meet the following requirements:

i.(a)(i) The cover and all openings (e.g., access hatches, sampling ports) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, initially and, thereafter, at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(a)(ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the drain system except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

i.(b) The closed-vent system and control device shall be designed and operated in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.].

g. [61.346(b)(1-3)]
As an alternative to complying with 40 CFR 61.346(a) [see section A.I.2.], the permittee may elect to comply with the following requirements:

i. Each drain shall be equipped with water seal controls or a tightly sealed cap or plug.

ii. Each junction box shall be equipped with a cover and may have a vent pipe. The vent pipe shall be at least 90 cm (3 ft) in length and shall not exceed 10.2 cm (4 in) in diameter.

ii.(a) Junction box covers shall have a tight seal around the edge and shall be kept in place at all times, except during inspection and maintenance.

ii.(b) One of the following methods shall be used to control emissions from the junction box vent pipe to the atmosphere:

ii.(b)(i) Equip the junction box with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation. An example of such a system includes use of water seal controls on the junction box. A flow indicator shall be installed, operated, and maintained on each junction box vent pipe to ensure that organic vapors are not vented from the junction box to the atmosphere during normal operation.

ii.(b)(ii) Connect the junction box vent pipe to a closed-vent system and control device in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.].

iii. Each sewer line shall not be open to the atmosphere and shall be covered or enclosed in a manner so as to have no visual gaps or cracks in joints, seals, or other emission interfaces.

h. STANDARDS: OIL-WATER SEPARATORS
[61.347(a)]
The permittee shall meet the following standards for each oil-water separator in which waste is placed in accordance with 40 CFR 61.342(c)(1)(ii) [see section A.I.2.]:

[61.347(a)(1)(i)]
i. The permittee shall install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the oil-water separator to a control device.

i.(a) The fixed-roof shall meet the following requirements:

i.(a)(i) The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(a)(ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the oil-water separator except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

[61.347(a)(1)(ii)]

i.(b) The closed-vent system and control device shall be designed and operated in accordance with the requirements of 40 CFR 61.349 [see sections A.I.2. and A.III.].

i. TANDARDS: TREATMENT PROCESSES
[61.348(a)(1) through (5)]
The permittee shall treat the waste stream in accordance with the following requirements:

i. The permittee shall design, install, operate, and maintain a treatment process that removes benzene from the waste stream to a level less than 10 parts per million by weight (ppmw) on a flow-weighted annual average basis.

ii. Each treatment process shall be designed and operated in accordance with the appropriate waste management unit standards specified in this permit.

iii. For the purpose of complying with the requirements specified in 40 CFR 61.348(a)(1)(i) [see paragraph i. of this section], the intentional or unintentional reduction in the benzene concentration of a waste stream by dilution of the waste stream with other wastes or materials is not allowed.

iv. The permittee may aggregate or mix together individual waste streams to create a combined waste stream for the purpose of facilitating treatment of waste to comply with the requirements of 40 CFR 61.348(a)(1) [see paragraph i. of this section] except as provided in 40 CFR 61.348(a)(5) [see paragraph v. of this section].

v. If the permittee aggregates or mixes any combination of process wastewater, or product tank drawdown, together with other waste streams to create a combined waste stream for the purpose of facilitating management or treatment of waste in a wastewater treatment system, then the wastewater treatment system shall be operated in accordance with 40 CFR 61.348(b). These provisions apply to above-ground wastewater treatment systems as well as those that are at or below ground level.

j. [61.348(c)]
The permittee shall demonstrate that each treatment process or wastewater treatment system unit, achieves the appropriate conditions specified in 40 CFR 61.348(a) [see section A.I.2.] or 40 CFR 61.348(b) in accordance with the following requirements:

i. engineering calculations in accordance with requirements specified in 40 CFR 61.356(e) [see section A.III.]; or

ii. performance tests conducted using the test methods and procedures that meet the requirements specified in 40 CFR 61.355 [see section A.V.].

k. [61.348(f)]
The Administrator may request at any time for the permittee to demonstrate that a treatment process or wastewater treatment system unit meets the applicable requirements specified in 40 CFR 61.348 (a) [see section A.I.2.] or 40 CFR 61.348(b) by conducting a performance test using the test methods and procedures as required in 40 CFR 61.355 [see sections A.V.].

l. STANDARDS: CLOSED VENT SYSTEMS AND CONTROL DEVICES
[61.349(a)]
For each closed-vent system and control device used to comply with standards in accordance with 40 CFR 61.343 through 61.348 [see sections A.I.2. and A.III.], the permittee shall properly design, install, operate, and maintain the closed-vent system and control device in accordance with the following requirements:

[61.349(a)(1)]
i. The closed-vent system shall:

i.(a) Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h) [see section A.V.].

i.(b) All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

i.(c) For each closed-vent system complying with 40 CFR 61.349(a) [see section A.I.2.], one or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

[61.349(a)(2)]
ii. The control device shall be designed and operated in accordance with the following conditions. A vapor recovery system (e.g., a carbon adsorption system or a condenser) shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater, or shall recover or control the benzene emissions vented to it with an efficiency of 98 weight percent or greater.

m. [61.349(b)]
Each closed-vent system and control device used to comply with this subpart shall be operated at all times when waste is placed in the waste management unit vented to the control device except when maintenance or repair of the waste management unit cannot be completed without a shutdown of the

control device.

n. [61.349(c)]
The permittee shall demonstrate that each control device, except for a flare, achieves the appropriate conditions specified in 40 CFR 61.349(a)(2) [see section A.I.2.] by using one of the following methods:

i. engineering calculations in accordance with requirements specified in 40 CFR 61.356(f) [see section A.III.]; or

ii. performance tests conducted using the test methods and procedures that meet the requirements specified in 40 CFR 61.355 [see section A.V.].

o. [61.349(e)]
The Administrator may request at any time for the permittee to demonstrate that a control device meets the applicable conditions specified in 40 CFR 61.349(a)(2) [see section A.I.2.] by conducting a performance test using the test methods and procedures as required in 40 CFR 61.355 [see section A.V.] as appropriate.

p. [61.350] STANDARDS: DELAY OF REPAIR
[61.350 (a)]
i. Delay of repair of facilities or units that are subject to the provisions of this subpart will be allowed if the repair is technically impossible without a complete or partial facility or unit shutdown.

[61.350(b)]
ii. Repair of such equipment shall occur before the end of the next facility or unit shutdown.

q. DNF COMPRESSORS
[60.482-1(b)]
i. Compliance for the DNF compressors will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485 [see section A.V.].

[60.482-3(a)]
ii. Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and 40 CFR 60.482-3(i) [see section A.III.].

[60.482-3(b)]
iii. Each compressor seal system shall be:

iii.(a) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or

iii.(b) Equipped with a barrier fluid system that is connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10; or

iii.(c) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

[60.482-3(c)]
iv. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.

r. [60.482-9] DELAY OF REPAIR FOR EQUIPMENT LEAKS
[60.482-9(a)]
i. Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

[60.482-9(b)]
ii. Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
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II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
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III. **Monitoring and/or Record Keeping Requirements**

1. [61.346(a)] MONITORING FOR INDIVIDUAL DRAIN SYSTEMS

a. [61.346(a)(2)]
Each cover seal, access hatch, and all other openings shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur and that access hatches and other openings

are closed and gasketed properly.

b. [61.346(a)(3)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

2. [61.346(b)(4)]
Equipment installed in accordance with 40 CFR 61.346(b)(1), 40 CFR 61.346(b)(2) or 40 CFR 61.346(b)(3) [see section A.I.2.] shall be inspected as follows:

a. Each drain using water seal controls shall be checked by visual or physical inspection initially and thereafter quarterly for indications of low water levels or other conditions that would reduce the effectiveness of water seal controls.

b. Each drain using a tightly sealed cap or plug shall be visually inspected initially and thereafter quarterly to ensure caps or plugs are in place and properly installed.

c. Each junction box shall be visually inspected initially and thereafter quarterly to ensure that the cover is in place and to ensure that the cover has a tight seal around the edge.

d. The unburied portion of each sewer line shall be visually inspected initially and thereafter quarterly for indication of cracks, gaps, or other problems that could result in benzene emissions.

3. [61.346(b)(5)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal, gap, crack or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

4. [61.347] MONITORING REQUIREMENTS FOR OIL-WATER SEPARATORS

a. [61.347(b)]
Each cover seal, access hatch, and all other openings shall be checked by visual inspection initially and quarterly thereafter to ensure that no cracks or gaps occur between the cover and oil-water separator wall and that access hatches and other openings are closed and gasketed properly.

b. [61.347(c)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

5. [61.348(e)] MONITORING FOR TREATMENT PROCESSES

a. If the treatment process or wastewater treatment system unit has any openings (e.g., access doors, hatches, etc.), all such openings shall be sealed (e.g., gasketed, latched, etc.) and kept closed at all times when waste is being treated, except during inspection and maintenance.

b. Each seal, access door, and all other openings shall be checked by visual inspections initially and quarterly thereafter to ensure that no cracks or gaps occur and that openings are closed and gasketed properly.

c. Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], when a broken seal or gasket or other problem is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification.

6. [61.349] MONITORING FOR CLOSED VENT SYSTEMS AND CONTROL DEVICES

a. [61.349(f)]
Each closed-vent system and control device shall be visually inspected initially and quarterly thereafter. The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.

b. [61.349(g)]
Except as provided in 40 CFR 61.350 [see section A.I.2.(Standards: Delay of Repair)], if visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed.

c. [61.349(h)]
The permittee of a control device that is used to comply with the provisions of this section shall monitor the control device in accordance with 40 CFR 61.354(c) [see section A.III.].

7. [61.354] MONITORING OF OPERATIONS

a. [61.354(a)(2)]
The permittee shall monitor each treatment process or wastewater treatment system unit to ensure the unit is properly operated and maintained by the following monitoring procedures:

Install, calibrate, operate, and maintain according to manufacturer's specifications equipment to

continuously monitor and record a process parameter (or parameters) for the treatment process or wastewater treatment system unit that indicates proper system operation. The permittee shall inspect at least once each operating day the data recorded by the monitoring equipment (e.g., temperature monitor or flow indicator) to ensure that the unit is operating properly.

b. [61.354(c)]
The permittee subject to the requirements in 40 CFR 61.349 [see section A.I.2. and A.III.] shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the control device operation as specified in the following paragraphs, unless alternative monitoring procedures or requirements are approved for that facility by the Administrator. The permittee shall inspect at least once each operating day the data recorded by the monitoring equipment (e.g., temperature monitor or flow indicator) to ensure that the control device is operating properly.

c. [61.354(d)]
For a carbon adsorption system that does not regenerate the carbon bed directly on site in the control device (e.g., a carbon canister), either the concentration level of the organic compounds or the concentration level of benzene in the exhaust vent stream from the carbon adsorption system shall be monitored on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The device shall be monitored on a daily basis or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater. As an alternative to conducting this monitoring, the permittee may replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and either the organic concentration or the benzene concentration in the gas stream vented to the carbon adsorption system.

8. RECORD KEEPING REQUIREMENTS
[61.356(a)]
The permittee shall comply with the record keeping requirements of this section. Each record shall be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified.

9. [61.356(d)]
The permittee using control equipment in accordance with 40 CFR 61.343 through 61.347 [see sections A.I.2. and A.III.], shall maintain engineering design documentation for all control equipment that is installed on the waste management unit. The documentation shall be retained for the life of the control equipment. If a control device is used, then the permittee shall maintain the control device records required by 40 CFR 61.356(f) [see section A.III.].

10. [61.356(e)]
The permittee shall maintain the following records. The documentation shall be retained for the life of the unit.

a. A statement signed and dated by the permittee certifying that the unit is designed to operate at the documented performance level when the waste stream entering the unit is at the highest waste stream flow rate and benzene content expected to occur.

b. If engineering calculations are used to determine treatment process or wastewater treatment system unit performance, then the permittee shall maintain the complete design analysis for the unit. The design analysis shall include, for example, the following information: design specifications, drawings, schematics, piping and instrumentation diagrams, and other documentation necessary to demonstrate the unit performance.

c. If performance tests are used to determine treatment process or wastewater treatment system unit performance, then the permittee shall maintain all test information necessary to demonstrate the unit performance, including:

i. A description of the unit including the following information: type of treatment process; manufacturer name and model number; and for each waste stream entering and exiting the unit, the waste stream type (e.g., process wastewater, sludge, slurry, etc.), and the design flow rate and benzene content.

ii. Documentation describing the test protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the unit performance. The description of the test protocol shall include the following information: sampling locations, sampling method, sampling frequency, and analytical procedures used for sample analysis.

iii. Records of unit operating conditions during each test run including all key process parameters.

iv. All test results.
d. If a control device is used, then the permittee shall maintain the control device records required by 40 CFR 61.356(f) [see section A.III.].

11. [61.356(f)]
The permittee using a closed-vent system and control device in accordance with 40 CFR 61.349 [see sections A.I.2. and A.III.] shall maintain the following records. The documentation shall be retained for the life of the control device.

a. A statement signed and dated by the permittee certifying that the closed-vent system and control device are designed to operate at the documented performance level when the waste management unit vented to the control device is or would be operating at the highest load or capacity expected to occur.

b. If engineering calculations are used to determine control device performance in accordance with 40 CFR 61.349(c) [see section A.I.2.], then a design analysis for the control device that includes:

i. Specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the permittee,

or the control device manufacturer or vendor that describes the control device design based on acceptable engineering texts.

ii. The design analysis shall address the following vent stream characteristics and control device operating parameters. For a carbon adsorption system that does not regenerate the carbon bed directly on-site in the control device, such as a carbon canister, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level or the design exhaust vent stream benzene concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.
c. If performance tests are used to determine control device performance in accordance with 40 CFR 61.349(c) [see section A.I.2.]:

i. A description of how it is determined that the test is conducted when the waste management unit or treatment process is operating at the highest load or capacity level. This description shall include the estimated or design flow rate and organic content of each vent stream and definition of the acceptable operating ranges of key process and control parameters during the test program.

ii. A description of the control device including the type of control device, control device manufacturer's name and model number, control device dimensions, capacity, and construction materials.

iii. A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.

iv. All test results.

12. [61.356(g)]
The permittee shall maintain a record for each visual inspection required by 40 CFR 61.343 through 61.347 [see sections A.I.2. and A.III.] that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

13. [61.356(h)]
The permittee shall maintain a record for each test of no detectable emissions required by 40 CFR 61.343 through 61.347 and 40 CFR 61.349 [see sections A.I.2. and A.III.]. The record shall include the following information: date the test is performed, background level measured during test, and maximum concentration indicated by the instrument reading measured for each potential leak interface. If detectable emissions are measured at a leak interface, then the record shall also include the waste management unit, control equipment, and leak interface location where detectable emissions were measured, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

14. [61.356(i)]
For each treatment process and wastewater treatment system unit operated to comply with 40 CFR 61.348 [see section A.I.2.], the permittee shall maintain documentation that includes the following information regarding the unit operation:

a. Dates of startup and shutdown of the unit.

b. If a process parameter is continuously monitored in accordance with 40 CFR 61.354(a)(2) [see section A.III.], the permittee shall maintain records that includes a description of the operating parameter (or parameters) to be monitored to ensure that the unit will be operated in conformance with these standards and the unit's design specifications, and an explanation of the criteria used for selection of that parameter (or parameters). This documentation shall be kept for the life of the unit.

c. Periods when the unit are not operated as designed.

15. [61.356(j)]
For each control device, the permittee shall maintain documentation that includes the following information regarding the control device operation:

a. Dates of startup and shutdown of the closed-vent system and control device.

b. A description of the operating parameter (or parameters) to be monitored to ensure that the control device will be operated in conformance with these standards and the control device's design specifications and an explanation of the criteria used for selection of that parameter (or parameters). This documentation shall be kept for the life of the control device.

c. Periods when the closed-vent system and control device are not operated as designed.

d. If a carbon adsorber that is not regenerated directly on site in the control device is used, then the permittee shall maintain records of dates and times when the control device is monitored, when breakthrough is measured, and shall record the date and time when the existing carbon in the control device is replaced with fresh carbon.

16. DNF COMPRESSORS MONITORING
[60.482-3(d)]
Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.

17. [60.482-3(e)]
Each sensor shall be checked daily or shall be equipped with an audible alarm. The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, barrier fluid system, or both.

18. [60.482-3(f)]
If the sensor indicates failure of the seal system or barrier system, or both based on the criterion determined under 40 CFR 60.482-3(e) [see section A.III.], a leak is detected.

19. [60.482-3(g)]
When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9 [see section A.I.2.]. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

20. [60.482-3(i)]
Any compressor that is designated, as described in 40 CFR 60.486(e)(1) and (2) [see section A.III.], for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-3(a)-(h) [see sections A.I.2. and A.III.] if the compressor:

[60.482-3(i)(1)]
a. Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the methods specified in 40 CFR 60.485(c) [see section A.V.]; and

[60.482-3(i)(2)]
b. Is tested for compliance with 40 CFR 60.482-3(i)(1) [see section A.III.] initially upon designation, annually, and at other times requested by the Administrator.

21. DNF COMPRESSOR RECORD KEEPING
[60.486(b)]
When each leak is detected as specified in 40 CFR 60.482-2, 40 CFR 60.482-3, 40 CFR 60.482-7, 40 CFR 60.482-8, and 40 CFR 60.483-2 [see sections A.I.2. and A.III.], the following requirements apply:

a. A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

b. The identification on equipment, may be removed after it has been repaired.

22. [60.486(c)]
When each leak is detected as specified in 40 CFR 60.482-2, 40 CFR 60.482-3, 40 CFR 60.482-7, 40 CFR 60.482-8, and 40 CFR 60.483-2 [see sections A.I.2. and A.III.], the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

a. The instrument and operator identification numbers and the equipment identification number.

b. The date the leak was detected and the dates of each attempt to repair the leak.

c. Repair methods applied in each attempt to repair the leak.

d. "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a) [see section A.V. (for compressors)] after each repair attempt is equal to or greater than 10,000 ppm.

e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

f. The signature of the permittee (or designate) whose decision it was that repair could not be effected without a process shutdown.

g. The expected date of successful repair of the leak if a leak is not repaired within 15 days.

h. Dates of process unit shutdown that occur while the equipment is unrepaired.

i. The date of successful repair of the leak.

23. [60.486(e)]
The following information pertaining to the DNF compressors shall be recorded in a log that is kept in a readily accessible location:

a. A list of identification numbers for equipment subject to the compressor requirements of this permit.

b. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-3(i) [see section A.III.]. The designation of equipment as subject to 40 CFR 60.482-3(i) [see section A.III.] shall be signed by the permittee.

c. The dates of each compliance test as required in 40 CFR 60.482-3(i) [see section A.III.].

d. The background level measured during each compliance test.

e. The maximum instrument reading measured at the equipment during each compliance test.

24. [60.486(h)]
The following information shall be recorded in a log that is kept in a readily accessible location:

a. A list of identification numbers for equipment subject to the compressor requirements of this permit.

b. Design criterion required in 40 CFR 60.482-3(e)(2) [see section A.III.] and explanation of the design criterion.

c. Any changes to this criterion and the reasons for the changes.

25. [60.486(j)]
Information and data used to demonstrate that a compressor is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

26. The permittee shall maintain the following monthly records:

a. the wastewater throughput as determined by measured flow rates;

b. the average benzene, ethylbenzene, toluene and xylene concentrations as determined from measured monthly concentrations (input parameters for the WATER8 model);

c. the monthly VOC emissions from each unit (dissolved nitrogen flotation unit and the activated sludge system);

d. the total hours of operation of each unit; and

e. the average hourly VOC emission rate from each unit (dissolved nitrogen flotation unit and the activated sludge system).

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(d)] REPORTING REQUIREMENTS FROM SUBPART FF
If the total annual benzene quantity from facility waste is equal to or greater than 10 Mg/yr, then the permittee shall submit to the Administrator and the Toledo Division of Environmental Services (TDOES) the following reports:

[61.357(d)(2)]
a. The permittee shall submit an annual report that updates the information listed in 40 CFR 61.357(a) [see paragraphs a.i. through a.iv. of this section]. If the information in the annual report required has not changed in the following year, the permittee may submit a statement to that effect.

i. Total annual benzene quantity from facility waste.

ii. A table identifying each waste stream and whether or not the waste stream will be controlled for benzene emissions.

iii. For each waste stream identified as not being controlled for benzene emissions, the following information shall be added to the table:

iii.(a) whether or not the water content of the waste stream is greater than 10 percent;

iii.(b) whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;

iii.(c) annual waste quantity for the waste stream;

iii.(d) range of benzene concentrations for the waste stream;

iii.(e) annual average flow-weighted benzene concentration for the waste stream; and

iii.(f) annual benzene quantity for the waste stream.

iv. The information required above should represent the waste stream characteristics based on current configuration and operating conditions. The permittee only needs to list in the report those waste streams that contact materials containing benzene. The report does not need to include a description of the controls to be installed to comply with the standard or other information required in 40 CFR 61.10(a).
[61.357(d)(6)]
b. The permittee shall submit a quarterly certification that all of the required inspections have been carried out in accordance with the requirements of this permit.

[61.357(d)(7)]
c. The permittee shall submit a quarterly report that includes:

i. If a treatment process or wastewater treatment system unit is monitored in accordance with 40 CFR 61.354(a)(2) [see section A.III.], then each 3-hour period of operation during which the average value of the monitored parameter is outside the range of acceptable values or during which the unit is not operating as designed.

ii. For a control device monitored in accordance with 40 CFR 61.354(c) [see section A.III.], each period of operation monitored during which any of the following conditions occur, as applicable to the control device: Each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified in 40 CFR 61.354(c) [see section A.III.].

[61.357(d)(8)]
d. The permittee shall submit an annual report that summarizes all inspections required by 40 CFR 61.342 through 61.354 [see sections A.I.2. and A.III.] during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about the repairs or corrective action taken.

2. [60.487(c)] REPORTING REQUIREMENTS FROM SUBPART VV
The permittee shall submit semiannual reports that include the following information:

a. Process unit identification.

b. For each month during the semiannual reporting period:

i. number of compressors for which leaks were detected as described in 40 CFR 60.382-3(f) [see section A.III.];

ii. number of compressors for which leaks were not repaired as required in 40 CFR 60.382-3(g) [see section A.III.]; and

iii. the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.

c. Dates of process unit shutdowns which occurred within the semiannual reporting period.

d. Revisions to items reported in the initial semiannual report, if changes have occurred since the initial report or subsequent revisions to the initial report.

3. The permittee shall submit deviation (excursion) reports which identify all exceedences of the hourly limitations for VOC for the dissolved nitrogen flotation unit and the activated sludge system.

4. The permittee shall also submit annual reports which specify the total VOC emissions from the dissolved nitrogen flotation unit and from the activated sludge system for the previous calendar year. These reports shall be submitted by January 31 of each year.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by review of facility records and results from tests and inspections using methods and procedures specified in sections A.V.2. through A.V.6.

2. [61.355(c)]
The permittee shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given below:

a. [61.355(c)(1)]
The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:

i. The determination shall be made at the point of waste generation.

NOTE: The point of waste generation is at Sunoco MidAmerica Marketing and Refining, located at the same property address in Toledo, Ohio. It shall be TWO LLC's responsibility to obtain this information from Sunoco in order to demonstrate compliance with 40 CFR Part 61, subpart FF. Sunoco's responsibility applies to sections A.V.2 and A.V.2.a-c which are listed here for reference purposes only.

The determination of flow-weighted annual average benzene concentration for process unit turnaround waste shall be made using either of the methods given in paragraph 2.b. or 2.c. of this section. The resulting flow-weighted annual average benzene concentration shall be included in the calculation of annual benzene quantity as provided in paragraph 2.a.iii. of this section for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process unit turnaround.

ii. Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.

iii. Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination to reduce the benzene concentration.

iv. The determination shall be made prior to any treatment of the waste that removes benzene, except as specified in paragraph 2.a.i. of this section.

b. [61.355(c)(2)]
The permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the permittee shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the permittee and the Administrator do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under paragraph 2.c. of this section shall be used to resolve the disagreement.

c. [61.355(c)(3)]
Measurements of the benzene concentration in the waste stream in accordance with the following procedures:

i. Collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.

ii. For waste in enclosed pipes, the following procedures shall be used:

ii.(a) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.

ii.(b) A static mixer shall be installed in the process line or in a by-pass line unless the owner or operator demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.

ii.(c) The sampling tap shall be located within two pipe diameters of the static mixer outlet.

ii.(d) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.

ii.(e) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.

ii.(f) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 degrees C.

ii.(g) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.

ii.(h) The sample containers shall immediately be cooled and maintained at a temperature below 10 degrees C for transfer to the laboratory.

c. iii. When sampling from an enclosed pipe is not feasible, a minimum of three representative samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of benzene prior to sampling.

iv. Each waste sample shall be analyzed using one of the following test methods for determining the benzene concentration in a waste stream:

iv.(a) Method 8020, Aromatic Volatile Organics, in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(b) Method 8021, Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photoionization and Electrolytic Conductivity Detectors in Series in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(c) Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(d) Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics: Capillary Column Technique in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in 40 CFR 61.18);

iv.(e) Method 602, Purgeable Aromatics, as described in 40 CFR Part 136, Appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA method; or

iv.(f) Method 624, Purgeables, as described in 40 CFR Part 136, Appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA method.

c. v. The flow-weighted annual average benzene concentration shall be calculated by averaging the results of the sample analyses using the equation in 40 CFR 61.355(c)(3)(v).

3. [61.355(d)]
The permittee using performance tests to demonstrate compliance of a treatment process with 40 CFR 61.348(a)(1)(i) [see section A.I.2.] shall measure the flow-weighted annual average benzene concentration of the waste stream exiting the treatment process by collecting and analyzing a minimum of three representative samples of the waste stream using the procedures in 40 CFR 61.355 (c)(3) [see section A.V.]. The test shall be conducted under conditions that exist when the treatment process is operating at the highest inlet waste stream flow rate and benzene content expected to occur. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a test. The permittee shall record all process information as is necessary to document the operating conditions during the test.

4. [61.355(h)]
The permittee shall test equipment for compliance with no detectable emissions as required in accordance with the following requirements:

a. Monitoring shall comply with 40 CFR Part 60, Appendix A, Method 21.

b. The detection instrument shall meet the performance criteria of Method 21.

c. The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.

d. Calibration gases shall be:

i. zero air (less than 10 ppm of hydrocarbon in air); and

ii. a mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.

e. The background level shall be determined as set forth in Method 21.

f. The instrument probe shall be traversed around all potential leak interfaces as close as possible to the interface as described in Method 21.

g. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared to 500 ppm for determining compliance.

5. DNF COMPRESSORS
[60.485(a)]
In conducting the performance tests required in 40 CFR Part 60, Subpart A, the permittee shall use as reference methods and procedures the test methods in 40 CFR Part 60, Appendix A or other methods and procedures as specified in this permit.

6. [60.485(b)]
The permittee shall determine compliance with the standards in sections A.III.33. through A.III.40. as follows:

a. Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used:

a. i. zero air (less than 10 ppm of hydrocarbon in air); and

b. ii. a mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm of methane or n-hexane.

7. [60.485(c)]
The permittee shall determine compliance with the no detectable emission standards in 40 CFR 60.482-3(i) [see section A.III.] as follows:

a. The requirements of 40 CFR 60.485(b) [see section A.V.] shall apply.

b. Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.

8. Compliance with the emission limitations specified in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation for the dissolved nitrogen flotation unit:

11.15 lbs/hr of VOC
48.8 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations based on the wastewater throughput, as determined by the record keeping in section A.III.26, and an emission factor of 15.2 kg of VOC (33.5 lbs of VOC) per million gallons of wastewater (U.S. E.P.A. report, "VOC Emissions From Petroleum Refinery Wastewater Systems", dated 1985). An average hourly emission can be determined based on the above stated emission factor times the monthly throughput, and divided by the month's hours of operation from the record keeping requirements in section A.III.26.

b. Emission Limitation for the activated sludge system:

5.70 lbs/hr of VOC
24.97 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through engineering calculations using U.S. EPA's WATER8 software, version 4.0, to determine annual VOC emissions from the activated sludge system along with the record keeping requirements of section A.III.26. An average hourly VOC emission rate can be determined by dividing the annual VOC emissions by the hours of operation per year and multiplying by 2000 lbs/ton.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: P001 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T105 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
internal floating roof storage tank with a capacity of 10,000 BBL	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. The permittee shall maintain records of the following information:

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

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

a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

2. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

3. [61.357(k)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

4. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T105 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T106 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons)	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. The permittee shall maintain records of the following information:

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

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

2. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

3. [61.357(k)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

4. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T106 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T108 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
internal floating roof storage tank with a capacity of 3,000 BBL (126,000 gallons)	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with the following requirements of 40 CFR Part 60, Subpart Kb:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. The permittee shall maintain records of the following information:

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

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

2. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.2.a.

3. [61.357(k)-->60.115b]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.2. Each record shall identify the storage vessel on which the inspection was performed and shall contain the

date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

4. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b]
If any of the conditions described in section A.III.2.a are detected during the annual visual inspection required by section A.III.2.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notify Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.2.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T108 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T143 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
67,130 BBL internal floating roof storage tank	OAC rule 3745-31-05(A)(3) (PTI 04-717)	1.65 tpy of volatile organic compounds (VOC)
	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	40 CFR Part 60, Subpart Kb	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the

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

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

2. [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

4. [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was

unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

5. The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

6. The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

7. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure exceeds 5.2 kPa (0.754 psia).

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements in sections A.III.5. and A.III.6.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T143 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T144 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
67,130 BBL internal floating roof storage tank	OAC rule 3745-31-05(A)(3) (PTI 04-717)	1.65 tpy of volatile organic compounds (VOC)
	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	40 CFR Part 60, Subpart Kb	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

2. [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

4. [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

5. The permittee shall maintain a record of the following:

a. volatile organic liquid (VOL) stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

6. The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

7. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure exceeds 5.2 kPa (0.754 psia).

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting

requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements in sections A.III.5 and A.III.6.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T144 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T145 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
67,130 BBL internal floating roof storage tank	OAC rule 3745-31-05(A)(3) (PTI 04-717)	1.65 tpy of volatile organic compounds (VOC)
	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	40 CFR Part 60, Subpart Kb	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

a. vi. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the

roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

2. [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

4. [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

5. The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

6. The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

7. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure exceeds 5.2 kPa (0.754 psia).

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

1.65 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements in sections A.III.5. and A.III.6.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T145 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T146 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
357,000 gallon internal floating roof storage	OAC rule 3745-31-05(A)(3)	2.94 tpy of volatile organic compounds (VOC)

tank	(PTI 04-717)	
	40 CFR Part 61, Subpart FF	See A.I.2.a below.
	40 CFR Part 60, Subpart Kb	See A.I.2.a below.
	OAC rule 3745-21-09(L)	See A.I.2.b below.

2. **Additional Terms and Conditions**

a. [61.351 --> 60.112b(a)(1)]

(a) The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb, including:

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

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

iii. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof. The closure device shall consist of a foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

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

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

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

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

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

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

b. The control measures established by this applicable rule are equal to or less stringent than the control measures established by 40 CFR Part 60, Subpart Kb.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. [61.356(k)-->60.115b(a)-->60.113b(a)(2) & (4)]
The permittee of each storage vessel equipped with a permanently affixed roof and internal floating roof shall:

a. For vessels equipped with a liquid-mounted primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days.

b. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in

accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in section A.III.1.a.

2. [61.357(k)-->60.115b(a)(2)]
The permittee shall keep a record for five years, of each inspection performed as required by section A.III.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. [60.116b(a) & (b)]
The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.

4. [60.113b(a)(5)]
The permittee shall notify Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by section A.III.1 of this permit to afford Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by section A.III.1 is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately, followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including the written documentation, may be made in writing and sent by express mail so that it is received by Toledo Division of Environmental Services at least 7 days prior to the refilling.

5. The permittee shall maintain a record of the following:

a. VOL stored;

b. the period of storage; and

c. the maximum true vapor pressure of that VOL during the respective storage period.

6. The permittee shall maintain the following records:

a. the annual throughput of each stored material; and

b. the estimated annual VOC emissions for all of the stored materials.

7. All records required by section A.III of this permit shall be maintained in accordance with the record keeping requirements specified in Part I - General Terms and Conditions A.1.a and A.1.b.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. [61.357(k)-->60.115b(a)(3)]
If any of the conditions described in section A.III.1.a are detected during the annual visual inspection required by section A.III.1.a, a report shall be furnished to Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2. [60.113b(a)(2)]
The permittee shall notifiy Toledo Division of Environmental Services in writing if a failure is detected during the inspections required in section A.III.1.b that cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. [60.116b(d)]
The permittee of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (or 0.754 psia) shall notify the Toledo Division of Environmental Services in writing within 30 days when the maximum true vapor pressure exceeds 5.2 kPa (0.754 psia).

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. All reports required by section A.IV of this permit shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance shall be determined by the monitoring and record keeping of section A.III. If required, compliance shall be demonstrated by the procedures specified in 40 CFR Part 60, Appendix A, Method 21.

2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

2.94 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined through emission calculations using the latest version of TANKS software, and the actual annual throughput(s) and maximum true vapor pressure(s) as determined by the record keeping requirements in sections A.III.5. and A.III.6.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 0448020080 Issuance type: Title V Final Permit

Go to the top of this document

Facility ID: 0448020080 Emissions Unit ID: T146 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit

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

VI. **Miscellaneous Requirements**

1. None