OhioEPA
State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

**TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**CERTIFIED MAIL**

**RE: FINAL PERMIT TO INSTALL**
**STARK COUNTY**
**Application No: 15-01654**
**Fac ID:** 1576000301

**DATE: 7/17/2007**

| | |
|---|---|
| | **TOXIC REVIEW** |
| | **PSD** |
| **Y** | **SYNTHETIC MINOR** |
| | **CEMS** |
| **40 CFR Part 63, Subpart CC and R** | **MACT** |
| **40 CFR Part 60, Subpart J and XX** | **NSPS** |
| | **NESHAPS** |
| | **NETTING** |
| | **MAJOR NON-ATTAINMENT** |
| | **MODELING SUBMITTED** |
| | **GASOLINE DISPENSING FACILITY** |

Marathon Petroleum Company LLC, Canton
Brent McNeese
2408 Gambrinus Ave., SW
Canton, OH 44706

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **Canton LAA**

| | |
|---|---|
| **Permit To Install** | **Issue Date: 7/17/2007** |
| **Terms and Conditions** | **Effective Date: 7/17/2007** |

## FINAL PERMIT TO INSTALL 15-01654

Application Number: 15-01654

Facility ID: 1576000301

Permit Fee: **$1250**

Name of Facility: Marathon Petroleum Company LLC, Canton

Person to Contact: Brent McNeese

Address: 2408 Gambrinus Ave., SW
Canton, OH 44706

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2408 Gambrinus Avenue SW**
**Canton**, **Ohio**

Description of proposed emissions unit(s):
**Modification of 15-01632 PTI to increase the throughput of the loading rack when using a VBS as control.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

**2. Scheduled Maintenance/Malfunction Reporting**

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

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

**3. Risk Management Plans**

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

**4. Title IV Provisions**

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

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

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

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Permit-To-Operate Application**

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**12. Air Pollution Nuisance**

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

### 13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## B. State Only Enforceable Permit-To-Install General Terms and Conditions

### 1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

## C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| VOC | 38.7 |
| CO | 20.88 |
| NOx | 8.35 |

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

### B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

## Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. State and Federally Enforceable Section

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

**1.** The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (J001) - Gasoline, diesel, and fuel oil loading rack. Chapter 31 modification to PTI 15-01632. The terms and conditions of this PTI supersede all the terms and conditions specified in 15-01632.**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) (PTI 15-01654) | 25.1 lbs CO/hr<br>10.0 lbs $NO_x$/hr<br><br>BAT includes compliance with the applicable sections of the refinery MACT(40 CFR Part 63, Subpart CC) and NSPS(40 CFR Part 60, Subpart R) as specified in the terms and conditions of this permit. See sections A.I.2.a. |
| OAC rule 3745-31-05(C) | 20.9 tpy CO per rolling, 12-month period<br>8.35 tpy NOx per rolling, 12-month period<br>See section A.II.14. |
| 40 CFR Part 63, Subpart R | See sections A.I.2.c and A.I.2.d.<br>See section A.III.1. |
| 40 CFR Part 63.650 | The control measures specified in 40 CFR Part 63.650 are equivalent to those specified in 40 CFR Part 63, Subpart R. |
| 40 CFR Part 60.18b | See sections A.I.2.e and A.I.2.f. |
| 40 CFR Part 63, Subpart A | The control measures specified in 40 CFR Part 63.11b are equivalent to those specified in 40 CFR Part 60.18b. |
| 40 CFR Part 60.105(a)(3)(ii) (Subpart J) | See section A.I.2.g. |
| 40 CFR Part 60.104(a)(1) ( Subpart J) | See section A.I.2.g. |

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-21-09(Q) | The control measures specified in OAC rule 3745-21-09(Q) are less stringent than those specified in 40 CFR Part 63, Subpart R. |

## 2. Additional Terms and Conditions

**2.a** The permittee shall comply with the hourly emission limitations for $NO_x$ and CO only when using a backup flare as a means for controlling VOC emissions.

**2.b** The permittee is restricted to 38.7 tons VOC/year based on a rolling, 12-month summation.

**2.c** [40 CFR Part 60.502(a) and 40 CFR Part 60.502(d)]
The permittee shall employ a vapor processing system designed to collect all of the OC vapors displaced from cargo tanks during loading. Each vapor processing system shall be designed to prevent any OC vapors collected at one loading rack from passing to another.

**2.d** [40 CFR Part 63.422(b)]
Emissions from the vapor collection and processing system due to the loading of gasoline cargo tanks (tank trucks or railroad cars) shall not exceed 10 milligrams of total organic compounds (OC) per liter of gasoline loaded (0.084 pound of OC per 1000 gallons of gasoline loaded). The averaging time for this emission limitation is 6 hours pursuant to 40 CFR Part 60.503.

**2.e** The permittee may utilize an R.A. Nichols portable equalizer/vapor burner system(VBS) during planned or unplanned VRU maintenance downtime as specified in section A.II.9 and in accordance with the Alternative Monitoring Plan approved by US EPA July 17, 2002.

**2.f** The permittee shall comply with all applicable emission limitations and requirements specified in this permit during the operation of the VBS control device. The vapor burner system shall be used only as a temporary control measure for VOC emissions. The use of a vapor burner system to control VOC emissions from this emissions unit may be re-evaluated at any time, based on information provided by MPC as specified in sections A.III or A.IV or as requested by the Canton LAA

**2.g** The permittee shall not burn in any fuel gas combustion device any fuel gas that contains hydrogen sulfide ($H_2S$) in excess of 230 mg/dscm (0.10 gr/dscf). The combustion in a flare of process upset gases or fuel gas that is released to the flare as a result of relief valve leakage or other emergency malfunctions is exempt.

**2.h** 40 CFR Part 63, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to 40 CFR Part 63, Subpart R.

**2.i** [40 CFR Part 60.502(h) and 40 CFR Part 60.502(i)]
The vapor collection and liquid loading equipment shall be designed and operated to prevent the gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during loading. No pressure-vacuum vent in the terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals.

**2.j** [40 CFR Part 63.427(b)]
The permittee shall operate the vapor processing system in a manner that will not cause an exceedance of the OC concentration in the exhaust air stream from the carbon absorption system as determined during the most recent stack test that demonstrated compliance.

**2.k** This emissions unit shall be designed for and operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours when using a VBS for control of emissions.

**2.l** The permittee shall comply with all of the operating restrictions, monitoring, record keeping, and reporting requirements established in the Marathon Petroleum Company LLC, Ohio Refining Division's, Canton Refinery Leak Detection and Repair(LDAR) program.

## II. Operational Restrictions

1. [40 CFR Part 60.502(e)(1) and 40 CFR Part 60.502(e)(6)]
The permittee shall load liquid product into vapor-tight gasoline cargo tanks. All gasoline loading lines, unloading lines and vapor lines shall be equipped with vapor tight fittings. Alternate procedures to those described in these terms and conditions for assuring vapor-tight operation of a gasoline cargo tank shall be approved by the Administrator and the City of Canton Health Department, Division of Air Pollution Control (CCHD, DAPC).

2. [40 CFR Part 60.502(f) and 40 CFR Part 60.502(g)]
The permittee shall load only gasoline cargo tanks at the affected facility that are equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. The permittee shall assure that the terminal and cargo tank vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility.

3. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

4. [40 CFR Part 60.502(e)(5) referenced from 40 CFR Part 63.422(c)]

The permittee shall take steps to assure that the non-vapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that:

a. The gasoline cargo tank meets the applicable test requirements in 40 CFR Part 63.425(e); and

b. For each gasoline cargo tank failing the test in 40 CFR Part 63.425(f) or (g) at the facility, the cargo tank either:

i. Meets the test requirements in 40 CFR Part 63.425(f) or (g) before repair work is performed on the cargo tank; or

ii. Passes the annual certification test described in 40 CFR Part 63.425(e) after the repair work is performed on the cargo tank or before or during the tests in 40 CFR Part 63.425(f) or (g).

5. Any liquid gasoline returned to a stationary storage tank located at the terminal from the vapor processing system shall be free of entrained air to the extent possible with good engineering design.

6. The vapor processing system shall be equipped with a means to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the device is disconnected during transfer of gasoline to a delivery vessel.

7. [40 CFR Part 63.424(g)]
The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

a. Minimize gasoline spills;

b. Clean up spills as expeditiously as practicable;

c. Cover all open gasoline containers with a gasketed seal when not in use; and

d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices.

8. The permittee shall repair, within 15 days, any leak from the vapor control system when such a leak is equal to or greater than 100% of the lower explosive limit as propane, pursuant to the compliance testing requirements found in OAC rule 3745-21-10(K).

9. The permittee shall only utilize the R.A. Nichols Engineering Portable Equalizer/Vapor Burner System(Model No. RAN PEVB15 - Serial No. PEVB15 - 03 - 05). An alternative Vapor Burner System may be used provided the permittee has demonstrated compliance with the emission limitations and applicable requirements specified in this

permit using the alternate VBS under the same conditions as its intended use in accordance with section A.V.3 . The permittee shall operate any vapor burner system in a manner such that it operates in conformance with the design of the device and according to manufacturer recommendations and specifications.

10. The VBS shall be operated at all times when emissions are being vented to it.

11. The VBS shall be operated with a flame present at all times.

12. Only gases with a net heating value of 11.2 MJ/scm (300 Btu/scf) or greater shall be burned in this emissions unit. Net heating value shall be calculated as specified in 40 CFR Part 63.18(f)(3). It shall be operated with an exit velocity less than 18.3 m/sec (60 ft./sec.) except as specified in section A.II.13.

13. If the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1000 Btu/scf), the permittee may operate the flare at an exit velocity equal to or greater than 18.3 m/sec (60 ft/sec), but less than 122 m/sec (400 ft/sec).

14. The maximum annual gasoline throughput rate for this emissions unit shall not exceed 920,000,000 gallons per year, based upon a rolling, 12-month summation of gasoline throughput.

    To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Gallons of gasoline throughput |
|---|---|
| 1 | 80,000,000 |
| 1-2 | 160,000,000 |
| 1-3 | 240,000,000 |
| 1-4 | 320,000,000 |
| 1-5 | 380,000,000 |
| 1-6 | 440,000,000 |
| 1-7 | 525,000,000 |
| 1-8 | 600,000,000 |
| 1-9 | 675,000,000 |
| 1-10 | 700,000,000 |
| 1-11 | 800,000,000 |
| 1-12 | 920,000,000 |

    After the first 12 calendar months of operation following the issuance of this permit compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the gasoline throughput.

15. The maximum gasoline throughput that shall be processed through the loading rack while the VBS is being used to control VOC emissions from this emissions unit shall not

exceed 500,000,000 gallons per year, based upon a rolling, 12-month summation of gasoline throughput.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Gallons of gasoline throughput |
|---|---|
| 1 | 80,000,000 |
| 1-2 | 160,000,000 |
| 1-3 | 240,000,000 |
| 1-4 | 320,000,000 |
| 1-5 | 380,000,000 |
| 1-6 | 440,000,000 |
| 1-7 | 500,000,000 |
| 1-8 | 500,000,000 |
| 1-9 | 500,000,000 |
| 1-10 | 500,000,000 |
| 1-11 | 500,000,000 |
| 1-12 | 500,000,000 |

After the first 12 calendar months of operation following the issuance of this permit compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the gasoline throughput while the VBS is being used to control VOC emissions from this emissions unit.

## III. Monitoring and/or Recordkeeping Requirements

1. [40CFR Part 63.427(a)]
The permittee shall operate, certify, maintain, and calibrate a continuous monitoring system as specified below in accordance with the manufacturer's specifications and 40 CFR Part 63.8. The continuous emission monitoring system (CEMS) shall continuously measure OC concentration in percent and shall be used to demonstrate compliance with the 10 milligrams of total organic compounds per liter of gasoline loaded limitation.

2. The permittee shall operate and maintain the existing equipment to continuously monitor and record the VOC emissions from this emissions unit, in percent, with the detection principle of the reference method specified in this permit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

3. The permittee shall maintain records of all data obtained by the VOC CEMS including, but not limited to, percent VOC, by volume, on an instantaneous basis in 6-hour averaging periods, results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

4. A statement of certification of the existing VOC CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director of Ohio EPA or the Canton local air agency upon request.

5. For purposes of demonstrating compliance with the allowable VOC emission limitation of 10 mg of VOC/liter of fuel loaded(0.084 lbs VOC/1000 gallons gasoline loaded), the permittee has demonstrated that a VOC concentration in the exhaust gases of 0.50 %, by volume, is equivalent to the allowable VOC emission limitation. This equivalent value may be revised based upon additional testing by the permittee and the written approval of the Ohio EPA.

6. The permittee shall maintain records of the most recently determined CEM equivalent percent for the 10 mg VOC/Liter fuel loaded number, an analysis demonstrating how the number was developed, and any support documentation including stack test reports.

7. [40 CFR Part 60.502(e)(2) and 40 CFR Part 60.502(e)(3)]
The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded at the affected facility. The permittee shall cross check each tank identification number to be recorded with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

8. [40 CFR Part 60.505(b) as referenced from 40 CFR Part 60.502(e)(1)]
The permittee shall obtain vapor tightness documentation for each gasoline cargo tank. It shall be maintained in a documentation file and updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

   a. Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27;

   b. Tank owner and address;

   c. Tank identification number;

   d. Testing location;

   e. Date of test;

   f. Tester name and signature;

   g. Witnessing inspector, if any: name, signature, and affiliation; and

   h. Test results: actual pressure change in 5 minutes, mm of water (average for 2 runs).

9. [40 CFR Part 60.505(c)]

The permittee shall maintain records of the following information in a readily accessible location for at least 5 years and shall immediately make these records available to the Director upon verbal or written request:

a. The daily quantity of all gasoline loaded into gasoline tank trucks; and

b. The results of any leak checks, including, at a minimum, the following information:

i. The date of the inspection;

ii. The findings (may indicate no leaks discovered or location, nature, and severity of each leak);

iii. The leak determination method;

iv. The corrective action (date each leak repaired and reasons for any repair interval in excess of fifteen calendar days); and

v. The inspector's name and signature.

10. [40 CFR Part 63.428(b)]
The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as follows:

a. Annual certification testing performed under section A.V.4;

b. Continuous performance testing performed at any time at the facility under section A.V; and

c. The documentation for each test shall include, as a minimum, the following information:

i. Name of test: Annual Certification Test (Method 27, Annual Certification Test) Internal Vapor Valve, Leak Detection Test, Nitrogen Pressure Decay Field Test or Continuous Performance Pressure Decay Test;

ii. Cargo tank owner's name and address;

iii. Cargo tank identification number;

iv. Test location and date;

v. Tester name and signature;

vi. Witnessing inspector, if any: name, signature, and affiliation; and

vii. Vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing.

The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility.

11. [40 CFR Part 63.428(c)(1)]
The permittee shall keep an up-to-date, readily accessible record of all continuous monitoring data. This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record.

12. [40 CFR Part 63.428(c)(2)]
The permittee shall maintain records of the following:

a. All data and calculations, engineering assessments, and manufacturing recommendations used in determining the operating parameter value; and

b. The following information when using a flare under provisions of 40 CFR Part 63.11(b):

i. Flare design (i.e., steam assisted, air assisted, or non-assisted); and

ii. All visible emissions readings, heat content determinations, flow rate measurements, and exit velocity determinations made during the compliance determinations.

13. [40 CFR Part 63.424(a)]
The permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of a gasoline cargo tank.

14. [40 CFR Part 63.428(e) as referenced from 40 CFR Part 63.424(b)]
The permittee shall maintain a log book containing records of each leak inspection. The log records shall contain a list, summary description, or diagram showing the location of all equipment in gasoline service at the facility. It shall also contain the following for each leak detected:

a. The equipment type and identification number;

b. The nature of the leak (i.e., vapor or liquid) and the method of detection;

c. The date the leak was detected and the date of each attempt to repair the leak;

d. The repair methods applied in each attempt to repair the leak;

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

f. The expected date of successful repair of the leak; and

g. The date of successful repair of the leak.

15. [40 CFR Part 63.425(f)]
As an alternative to the leak monitoring requirements in the terms and conditions of this emissions unit, the permittee may implement the equipment leak provisions required under the facility section of this permit.

16. [40 CFR Part 63.424(c)]
The permittee shall record the detection of a liquid or vapor leak in a log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after the detection of each leak, except as provided in section A.III.13.

17. [40 CFR Part 63.424(d)]
Delay of repair of leaking equipment will be allowed upon a demonstration to the Administrator that repair within 15 days is not feasible. The permittee shall provide reasons for the delay and the date by which each repair is expected to be completed.

18. The permittee shall conduct monitoring as specified in 40 CFR Part 60.105(Subpart J) unless the permittee has demonstrated compliance with the hydrogen sulfide emission limitation using the alternative monitoring strategy as described in section A.VI.1. The permittee shall be exempt from hydrogen sulfide monitoring for this emission unit as specified in 40 CFR Part 60.105(Subpart J) when utilizing a portable vapor burner system for controlling VOC emissions only if the permittee has demonstrated compliance using the alternative monitoring strategy for sulfur dioxide emissions as described in section A.VI.1 and as specified in section A.III.18. The permittee will have to have demonstrated compliance with the applicable hydrogen sulfide emission limitation any time there is a change in the type of product or sulfur content of a product being transferred while using a VBS to control emissions that could result in a violation of the hydrogen sulfide emission limitation. If compliance with the applicable hydrogen sulfide emission limit cannot be demonstrated using the alternative monitoring plan, the permittee shall monitor the refinery fuel gas stream pursuant to 40 CFR Part 60.105 (Subpart J).

19. [40 CFR Part 63.427(a)(4)]
The permittee shall properly operate and maintain a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, in proximity to the pilot light to indicate the presence of a flame.

20. [40 CFR Part 63.428(c)(1)]
The permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under 40 CFR Part 63.427(a) (see section A.III.19) during

transfer of product. The date and time of day shall also be indicated at reasonable intervals on this record.

21. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

    a. The location and color of the emissions;

    b. Whether the emissions are representative of normal operations;

    c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

    d. The total duration of any visible emission incident; and

    e. Any corrective actions taken to eliminate the visible emissions.

    At any time the permittee observes visible emissions from the VBS, the permittee shall monitor the visible emissions for a minimum period of 30 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log. Visible emissions shall be read at a point in the plume immediately after the steam has dissipated.

22. The permittee shall maintain monthly records of the following information:

    a. The gasoline throughput for each month;

    b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the gasoline throughput; and

    c. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gasoline throughput for each calendar month.

    d. Total monthly VOC emissions calculated by multiplying the CEM equivalent percent for the 0.084 lbs VOC/1000 gallons gasoline loaded at the loading rack per month by the cumulative gasoline throughput for each calendar month.

23. The permittee shall monitor and record the number of gallons of gasoline processed through this emission unit monthly and on a rolling, 12 month summation while using the VBS to control VOC emissions from J001.

## IV. Reporting Requirements

1. [40 CFR Part 60.502(e)(4)]
   The permittee shall notify the owner or operator of each non-vapor- tight gasoline cargo tank loaded at the affected facility within 3 weeks after the loading has occurred. The permittee shall take steps assuring that the non-vapor-tight gasoline cargo tank will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained which documents that the gasoline cargo tank meets the applicable test requirements in section A.V.

2. The permittee shall submit a deviation report indicating any equipment leaks of vapor or liquid that are not repaired within 15 days after identification. The permittee shall provide reasons why the repairs could not be completed in 15 days after identification and the date when the repair will be completed. The report shall be submitted within 30 days after identification of the leak.

3. [40 CFR Part 63.428(g)]
   The permittee shall submit a semi-annual report to the Canton local air agency of each loading occurrence of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. This report shall also include the number of equipment leaks not repaired within 5 days after detecting the leak.

4. [40 CFR Part 63.428(h) and 40 CFR Part 63.10(e)(3)]
   The permittee shall submit an excess emissions report to the Canton local air agency in accordance with 40 CFR Part 63.10(e)(3). The permittee shall submit all reports to the Canton local air agency on a quarterly basis. All excess emissions and monitoring system performance reports shall be post marked on the 30th day following the end of the quarter. The reports shall include all the information required in 40 CFR Parts 63.10(c)(5) through 40 CFR Parts 63.10(c)(13) and sections 40 CFR Parts 63.8(c)(7) and 63.8(c)(8). These reports shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report. The reports shall also specify if there are no exceedances or that the VOC CEMS is out of service and provide the reason why it is out of service. The permittee shall submit one summary report identifying the VOC monitored at the emissions unit. The summary report shall be entitled "Summary Report-Gaseous Excess Emission and Continuous Monitoring System Performance " and shall contain the items specified below:

   a. The company name and address;

   b. An identification of each hazardous air pollutant monitored at the emission unit;

   c. The beginning and ending dates of the reporting period;

   d. A brief description of the process units;

   e. The emission and operating parameter limitations specified in the relevant standard(s), including an identification of all 6-hour rolling average % VOC values

that exceeded the % VOC, by volume, value that is equivalent to the allowable VOC emission limitation;

f. The monitoring equipment manufacturer(s) and model number(s);

g. The date of the latest CMS certification or audit;

h. The total operating time of the affected source during the reporting period;

i. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;

j. A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;

k. A description of any changes in CMS, processes, or controls since the last reporting period;

l. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. The date of the report.

If the total duration of process operating parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and the CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only a summary report shall be submitted. The full excess emissions and continuous monitoring system performance report need not be submitted under these circumstances.

5. [40 CFR Part 63.428(h)]
The following are reportable excess emissions events. Documentation of these occurrences shall be included in the excess emissions report:

a. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under section A.V.1.b. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CEM.

b. Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.

c. Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility.

d. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection:

i. The date on which the leak was detected;

ii. The date of each attempt to repair the leak;

iii. The reasons for the delay of repair; and

iv. The date of successful repair.

6. The permittee shall submit a deviation report to the Canton local air agency of any change in the description, types, identification numbers, and locations of the equipment in gasoline service at the facility.

7. The permittee shall submit quarterly deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period.

8. The permittee shall submit quarterly deviation reports which include visible emission readings conducted pursuant to the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 as a result of the presence of visible emissions from the flare and that exceed a total time of five minutes during any consecutive two hour period. These quarterly deviation reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

9. The permittee shall submit deviation reports in accordance with sections A.IV.4, A.IV.5, and A.IV.7 when the vapor burner system is in operation. The permittee shall submit deviation reports as specified in section A.IV.10 for periods when a VBS is used to control VOC emissions and compliance with the hydrogen sulfide emission limit was not demonstrated using the alternative monitoring plan described in section A.VI.1.

10. The permittee shall notify the Canton LAA, in writing, when a vapor burner system (VBS) shall be used to control VOC emissions from this emission unit thirty (30) days prior to a planned usage of a vapor burner system and within fourteen (14) days following an unplanned usage of a VBS. This notification shall include the following information:

    a. The dates and times of startup of the VBS.

    b. The reason for using the VBS.

    c. If the VBS is not the system specified in section A.I.2 and why an another system is being used.

    d. The date(s) when a different VBS from the one specified in section A.I.2 was tested and all stack test report(s).

    e. The approximate length of time a VBS shall be used to control VOC emissions.

    f. If there will be a change in the type of emissions to be controlled by the VBS.

11. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month gasoline throughput limitation . These reports are due by the date described in Part I- General Terms and Conditions of this permit under section (A)(2).

12. The permittee shall submit an annual deviation (excursion) report which identifies an exceedance of the 500,000,000 gallons of gasoline processed through J001 while using the VBS as the VOC control device.

## V. Testing Requirements

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

    a. Emission Limitation:
    Emissions from the vapor collection and processing system due to the loading of gasoline cargo tanks (tank trucks or railroad cars) shall not exceed 10 milligrams of total OC per liter of gasoline loaded (0.084 pound of OC per 1000 gallons of gasoline loaded).

    Applicable Compliance Method:
    The permittee shall demonstrate compliance based on the monitoring and record keeping requirements specified in section A.III.1. If required, the permittee shall demonstrate compliance by conducting a stack test in accordance with the procedures specified in 40 CFR Part 60.503 or an alternative method approved by the Canton local air agency.

b. Control Measure:
The vapor collection and liquid loading equipment shall be designed and operated to prevent the gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during loading.

Applicable Compliance Method:
The permittee shall demonstrate compliance during performance tests where the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded.

c. Control Measure:
The permittee may utilize an R.A. Nichols portable equalizer/vapor burner system during planned VRU maintenance or emergency VRU downtime as specified in section A.II.9. The permittee shall comply with all applicable emission limitations and requirements specified in this permit during the operation of this control device. The permittee shall also notify the Canton LAA any time a Vapor Burner System is used to comply with the provisions of this permit in accordance with section A.IV. The vapor burner system shall be used only as a temporary control measure for VOC emissions. The use of a vapor burner system to control VOC emissions from this emissions unit may be re-evaluated at any time by the Canton LAA, based on information provided by MPC as specified in sections A.III or AIV or as requested by the Canton LAA.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance by conducting a stack test in accordance with the methods and procedures specified in section A.V.2 for VOC emissions. The permittee shall also demonstrate compliance with the alternative monitoring plan described in section A.VI.1 and specified in section A.III .18 whenever the permittee changes the type of product or product specifications transferred through J001.

d. Emission Limitation:

25.1 lbs CO/hr.
10.0 lbs $NO_x$/hr.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance by conducting an emission test for $NO_x$ and CO utilizing USEPA methods 7 and 10, respectively and in accordance with section A.V.2.

e. Emissions Limitation:

20.9 tpy CO
8.35 tpy NOx

Applicable Compliance Method:

Compliance with the 20.9 tpy CO limitation is determined by multiplying 500,000,000 gallons, the maximum permitted throughput of gasoline for J001 while the using a VBS for VOC emission controls, by 0.0835 lbs CO/1000 gallon of gasoline loaded and dividing by 2000. Compliance with the 8.35 tpy NOx limitation is determined by multiplying 500,000,000 gallons, the maximum permitted throughput of gasoline for J001 while the using a VBS for VOC emission controls, by 0.0334 lbs NOx/1000 gallon of gasoline loaded and dividing by 2000.

The emission factors of 0.0334 lbs NOx/1000 gallons of gasoline and 0.0835 lbs CO/1000 gallons of gasoline were provided by the manufacturer of the VBS unit to be used at MPC loading rack.

f. Emissions Limitation: 920,000,000 gallons of gasoline throughput per rolling 12-month period.

Applicable Compliance Method:
Compliance with the annual gasoline throughput restriction shall be determined by record keeping specified in sections A.III.22.b and A.III.22.c.

g. Emission Limitation:

38.7 tons VOC/year as a rolling, 12 month summation of gasoline throughput

Applicable Compliance Method:
Compliance shall be demonstrated by the record keeping requirements in section A.III.22.

h. Emission Limitation:
Processing of a maximum of 500,000,000 gallons of gasoline annually while controlling VOC emissions from J001 using an approved VBS

Applicable Compliance Method:
Compliance demonstrated by the record keeping requirements in section A.III.23.

2. Within six(6) months following the issue date of this permit, the permittee shall conduct an emission test for this emissions unit in order to determine continuing compliance with the allowable emission rate for VOC and to reestablish the operating parameter value for this emissions unit in accordance with section A.III.6. This test shall be conducted between the months of May through August. The permittee shall use as reference methods and procedures the test methods in Appendix A of 40 CFR Part 60 or other methods and procedures as specified in 40 CFR Part 60.503(c), except as provided in 40 CFR Part 60.8(b). During any performance test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test. The three run requirement in 40 CFR Part 60.8(f) does not apply to

this emissions unit. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" (ITT) notification to the Canton local air agency. The notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the test. A pressure measurement device capable of measuring up to 500 mm of water gauge pressure with plus or minus 2.5 mm of water precision shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline cargo tank. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position in gasoline service must be tested at least once during the performance test in accordance with 40 CFR 60.503(d)(2). Personnel from the Canton local air agency shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test.

[40 CFR Part 63.425(b)]
For each performance test conducted, the permittee shall determine a monitored operating parameter value for the vapor processing system using the following procedure:

a. During the performance test, continuously record the VOC concentration operating parameter described in section A.III.1 of these terms and conditions.

b. Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations; and

c. Provide, for approval by the Administrator, the Canton local air agency and the Ohio EPA, the rationale for the selected operating parameter value and monitoring frequency and averaging time, develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in section A.I.2.a.

3. The permittee shall conduct an annual certification test for gasoline cargo tanks that shall consist of the following test methods and procedures:

a. 40 CFR Part 60, Appendix A, Method 27 and the test methods and procedures in 40 CFR Part 63.425(e); and

b. A pressure test of the cargo tank's internal vapor valve in accordance with 40 CFR Part 63.425(e).

4. The leak detection test shall be performed using 40 CFR Part 60, Appendix A, Method 21 and the test methods and procedures in 40 CFR 63.425(f).

5. For those cargo tanks with manifolded product lines, the permittee shall use the test procedure specified in 40CFR Part 63.425(g).

6. The continuous performance pressure decay test shall be performed using 40 CFR Part 60, Appendix A, Method 27 and as specified in 40 CFR Part 63.425(h).

## VI. Miscellaneous Requirements

1. In a letter dated June 24, 2002, from Marathon Ashland Petroleum LLC, Ohio Refining Division, Canton Ohio(MPC) to Mr. Charles Hall, USEPA Region V, Chicago, Ill., MPC requested approval of an Alternative Monitoring Plan for Combusted VOC vapors in a Portable Combustor during gasoline transfer at MPC's Loading Rack(emission unit J001). The plan was necessary in order to exempt MPC from conducting monitoring pursuant to 40 CFR Part 60.105(Subpart J) since the off gas from this emissions unit is defined as a refinery fuel gas pursuant to 40 CFR Part 60.101. The alternative monitoring plan was included in this letter. On July 17, 2002, in a letter from Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, US EPA Region V, US EPA approved MPC's alternative monitoring plan. The alternative monitoring plan is as follows:

   a. Representative air samples are be collected at the inlet to the VBS or VRU.

   b. Air samples shall be analyzed for hydrogen sulfide concentration. The samples are analyzed using a sensodyne air analyzer with a hydrogen sulfide detector tube.

   c. Two weeks of sampling are conducted.

   d. Test results are submitted for approval.

   The alternative monitoring plan includes conducting the monitoring in accordance with the Alternative Monitoring Plan for NSPS Subpart J Refinery Fuel Gas Document entitled "Conditions For Approval of an Alternative Monitoring Plan for Miscellaneous Refinery Fuel Streams", US EPA Sector Notebook, 1995.

## B. State Only Enforceable Section

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

**1.** The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (J001) - Gasoline/Diesel Loading Rack**

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

**2. Additional Terms and Conditions**

**2.a** None

### II. Operational Restrictions

None

### III. Monitoring and/or Recordkeeping Requirements

None

### IV. Reporting Requirements

None

### V. Testing Requirements

None

### VI. Miscellaneous Requirements

None