State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

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

RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY
Application No: 16-02392
Fac ID: 1667010021

DATE: 3/31/2005

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
XX	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Guttman Realty Co dba Bulk Terminal Stor
David Mick
1521 S Chillicothe Rd
Aurora, OH 44202

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA ARAQMD

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 3/31/2005**
Terms and Conditions	**Effective Date: 3/31/2005**

FINAL PERMIT TO INSTALL 16-02392

Application Number: 16-02392

Facility ID: 1667010021

Permit Fee: **$500**

Name of Facility: Guttman Realty Co dba Bulk Terminal Stor

Person to Contact: David Mick

Address: 1521 S Chillicothe Rd
Aurora, OH 44202

Location of proposed air contaminant source(s) [emissions unit(s)]:
1521 S Chillicothe Rd
Aurora, **Ohio**

Description of proposed emissions unit(s):
New Loading Rack, Change in Products Stored.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

Pollutant	Tons Per Year
VOC	88

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J002 - BTS West Loading Rack - petroleum loading rack controlled with enclosed vapor flare unit (3 truck bays with 12 loading arms)	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q), OAC rule 3745-35-07, and 40 CFR Part 60, Subpart XX. Volatile organic compound (VOC) emissions shall not exceed 24.02 lbs/hr and 27.45 tpy. (stack emissions) 18..04 tons per year fugitive VOC emissions from truck loading.
	OAC rule 3745-21-09(Q)	See A.2.a - A.2.d and B.1 - B.2 below.
	OAC rule 3745-35-07	The total amount of fuel loaded from all loading racks (J002 and J101) shall not exceed 480,320,000 gallons per year, as a rolling 12-month summation. The total amount of gasoline loaded from this emissions unit shall not exceed 140,000,000 gallons per year, as a rolling 12-month summation. The total amount of gasoline loaded from all loading racks (J002 and J101) shall not exceed 280,000,000

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		gallons per year, as a rolling 12-month summation. The total amount of transmix loaded from this emissions unit shall not exceed 5,000,000 gallons per year, as a rolling 12-month summation. The total amount of ethanol loaded from all loading racks (J002 and J101) shall not exceed 102,000,000 gallons per year, as a rolling 12-month summation. The emissions per rolling, 12-month period shall not exceed: 88.0 tons of VOC 22.9 tons of all hazardous air pollutants (HAPs); and 7.92 tons of any individual HAP See B.6 below.
	40 CFR Part 60, Subpart XX	The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See B.7 - B.12 below.

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2. Additional Terms and Conditions

2.a The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:

i. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and

ii. the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.

2.b The loading rack shall be equipped with a vapor control system whereby:

i. all vapors collected by the vapor collection system are vented to the vapor control system; and

ii. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

2.c A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

2.d All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.

B. Operational Restrictions

1. 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.

2. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

3. The vapor collection and control systems shall be kept in good working order and shall be used at all times during the transfer of any fuel into tank trucks. Approval to transfer any fuel into tank trucks without vapor controls following a malfunction or during scheduled maintenance of the vapor control system shall require prior approval of the Akron RAQMD in accordance with OAC rule 3745-15-06.

4. The permittee of this emissions unit shall ensure that the owner or operator of any tank truck used in conjunction with this emissions unit has complied with the requirements of OAC rule 3745-21-09(V), if applicable, before the tank truck is loaded.

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5. A pilot flame shall be maintained at all times in the flare's pilot light burner during the transfer of fuel.

6. Compliance with the emission limitations as stated in Section A.1 shall be achieved by restricting the throughout of fuels. The fuel throughout for both this emissions unit and the entire facility shall not exceed the following:

   a. 480,320,000 gallons per year of any fuel for both loading racks (J002 and J101);

   b. 140,000,000 gallons per year of gasoline for this emissions unit;

   c. 280,000,000 gallons per year of gasoline for both loading racks (J002 and J101);

   d. 5,000,000 gallons per year of transmix for this emissions unit; and

   e. 102,000,000 gallons per year of ethanol for both loading racks (J002 and J101).

   These throughput limitations are all bases upon a rolling 12-month summation of the monthly fuel throughout. The permittee has existing fuel throughput records and therefore does not need to be limited to first year monthly throughput amounts.

7. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

8. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

   a. the permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility.

   b. the permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

   c. The permittee shall cross-check each tank identification number obtained in paragraph b. of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

      i If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

      ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

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iii. If either the quarterly or semiannual cross-check provided in paragraphs 8.c.i through 8.c.ii of this section reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.

d. The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph c. of this section.

e. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

f. Alternate procedures to those described in paragraphs 8.a through 8.e of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator of USEPA.

9. The permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

10. The permittee shall act to assure that the terminal's and the truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks.

11. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

12. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain a device to continuously monitor for the presence of the pilot flame when the emissions unit is in operation. The monitoring device shall be installed, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals.

   The permittee shall properly install, operate, and maintain an interlock system to automatically shut down fuel transfer, using valves, at the loading rack in the absence of a pilot flame at the flare, and also prevent operation of the emissions unit if the device or collection system is not operating.

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2. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

3. A record of each monthly leak inspection required under section C.2 of this permit shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

   a. the date of inspection;

   b. the findings (may include no leak(s) discovered, or the location, nature, and severity of the leak(s));

   c. the leak determination method;

   d. the corrective action taken, including the date each leak was repaired and the reason for any repair interval in excess of 15 days; and

   e. the inspector's name and signature.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in section A.2.a.ii. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). This pressure shall be recorded on a daily basis (Monday through Friday, excluding holidays), in inches of water column.

5. The permittee shall submit a preventive maintenance plan (PMP), within 90 days of the issuance of this permit, to the Akron RAQMD for approval. Any subsequent changes to the PMP shall be mutually agreeable to the permittee and the Akron RAQMD. The PMP shall be implemented within 60 days after approval by the Akron RAQMD. The PMP shall include the methods and procedures used for the ongoing inspection and maintenance of the vapor control system, a daily operating check sheet for the vapor control system, and an annual inspection of the vapor control system. The annual inspection of the vapor control system shall be performed by an individual (company personnel or contracted consultant) trained in the operation and inspection of flares. The annual inspection report shall include all relevant information pertaining to the points of inspection carried out during the annual inspection and shall be maintained on site and made available during subsequent inspections by the Akron RAQMD.

   The permittee shall maintain the information required by the daily operating check sheet, developed as part of the PMP, on a daily basis. The permittee shall submit a copy of the check sheet to the Akron RAQMD within 90 days of the issuance of this permit. Any subsequent changes to this check sheet shall be mutually agreeable to the permittee and the Akron RAQMD.

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6. The permittee shall calculate and record, on an annual basis, the total VOC, individual HAP, and combined HAPs emissions from the entire facility. Emissions shall be calculated using the methodology specified in sections E.5.d and E.5.e.

7. The permittee shall maintain material safety data sheets (MSDS) for each type of fuel loaded at the facility.

   For the purpose of calculating annual HAP emissions as required in section C.6, the highest value for each component, in weight percent, based on current product MSDS shall be used..

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

   a. the total, individual throughout of all fuels loaded in both J002 and J101;

   b. the rolling, 12-month summations of the total individual throughout of all fuels loaded in both J002 and J101, in gallons; and,

   c. the calculated, total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs) and VOC emissions for all emissions units at the facility, in tons.

9. The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

10. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. 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. name, signature, and affiliation of witnessing inspector, if any; and
    h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

11. The permit to install for this emissions unit (J002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was

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compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.6181
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.818
MAGLC (ug/m3): 4476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.5615
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.194
MAGLC (ug/m3): 10,333

Pollutant: methyl-tert-butyl ether
TLV (mg/m3): 144
Maximum Hourly Emission Rate (lbs/hr): 0.2847
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.141
MAGLC (ug/m3): 3428

12. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

    a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

    b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

    c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

    If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

13. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

    a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

    b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

    c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure deviation (excursion) reports that identify all daily records which indicate that the pressure in the vapor collection system did not comply with the allowable range of minus 6 to plus 18 inches of water gauge pressure specified in A.2.a.ii.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel throughput limitations

3. The quarterly deviation reports shall be submitted as specified in Part 1 - General Terms and Conditions of this permit.

4. The permittee shall notify the Akron RAQMD in writing of any monthly record indicating that a leak was not repaired within 15 days. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the leak was discovered.

5. The permittee shall submit annual reports which specify the VOC, total combined HAPs, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

6. The emissions unit is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the U.S. EPA, 40 CFR Part 60, Subpart XX. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

   Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date)
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
Room 904
146 South High Street
Akron, OH 44308

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emission unit in accordance with the following requirements:

   a. the emission testing shall be conducted within 6 months of issuance of this permit during the summer months when the gasoline vapor pressure is highest;

   b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of total organic compounds from gasoline loading;

   c. the following test methods and procedures of 40 CFR Part 60 shall be employed to demonstrate compliance with the allowable mass emission rate for VOC:

Method 2A	inlet vapor volume
Method 21	potential leak sources
Method 25A or 25B	VOC concentration
Subpart XX [60.503(d)]	tank truck maximum pressure

   Testing shall be performed in accordance with the requirements of 40 CFR 60.503 and OAC rule 3745-21-10(E).

   d. the test(s) shall be conducted in accordance with the procedures outlined in both OAC rule 3745-21-10(E)(2) and 40 CFR 60.503(C)(1), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)

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2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s).

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

   a. Emission Limitation:

      35 mg of TOC per liter of gasoline loaded

      Applicable Compliance Method:

      Compliance with the allowable mass emission rate for TOC shall be determined through emission testing as required in sections E.1 through E.4 of these terms and conditions.

   b. Emission Limitation:

      Volatile organic compound (VOC) emissions shall not exceed 24.02 lbs/hr and 27.45 tpy. (stack emissions)

      Applicable Compliance Method:

      Compliance with the allowable hourly mass emission rate for VOC shall be determined through emission testing as required in sections E.1 through E.4 of these terms and conditions.

      Compliance with the annual emission limitation shall be demonstrated by compliance with the facility maximum throughput limitations and the record keeping requirements of section C.8 of these T&C's.

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c. Emission Limitation:

18.04 tons per year fugitive VOC emissions from truck loading.

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the maximum amount of fuel loaded per year, in gallons by the emission factor of 9mg/L (0.075#/1000 gallons, USEPA,1980 Bulk Gasoline Terminals Background Information for Proposed Standards, Table C-4), and then dividing by 2,000 lbs per ton.

d. Emission Limitation:

88.0 tons of VOC

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by calculating the sum of emissions determined by E.5.d.i through E.5.d.v.

i. VOC emissions from all storage tanks at the facility shall be determined by estimating emissions using the most recent version of EPA's Tanks computer software or the most recent emission factors for storage tanks contained in AP-42 Chapter 7.

ii. Fugitive VOC emissions from equipment leaks shall be determined by using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates".

iii. VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results for the control efficiency and the emission factor for fugitive loading of 9mg/L (0.075#/1000 gallons, USEPA,1980 Bulk Gasoline Terminals Background Information for Proposed Standards, Table C-4)

iv. Loading emissions for fuels other than gasoline shall be assigned an emission rate equivalent to that of gasoline, as determined from source testing.

v. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, fifth Edition, Table 5.1-2.

e. Emission Limitation:

22.9 tons of all hazardous air pollutants (HAPs); and
7.92 tons of any individual HAP

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Applicable Compliance Method:

To calculate HAP emissions, the permittee shall comply with the following procedures using the MSDS sheets as specified in section C.7:

For every individual HAP, multiply the maximum weight percent (weight fraction) of each HAP in the fuel by the total VOC emission rate for the year (in tons per year) for all emissions units at the facility, including fugitive emissions. To determine total combined HAPs emissions, sum the calculated annual emission rates for each individual HAP.

f. Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, Akron RAQMD, and Bulk Terminal Storage.

F. Miscellaneous Requirements

The following terms and conditions are federally enforceable requirements: A - F.

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