



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  
FRANKLIN COUNTY  
Application No: 01-08235**

**CERTIFIED MAIL**

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

**DATE: 10/26/2000**

BP Columbus Terminal  
LeAnne Kunce  
4800 East 49th St  
Cleveland, OH 44125

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**FINAL PERMIT TO INSTALL 01-08235**

Application Number: 01-08235  
APS Premise Number: 0125040239  
Permit Fee: **\$700**  
Name of Facility: BP Columbus Terminal  
Person to Contact: LeAnne Kunce  
Address: 4800 East 49th St  
Cleveland, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**303 Wilson Ave  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Tank 6 and 7 will be switched from distillate to gasoline service gasoline.**

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

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 Related to Monitoring and Recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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 thirty (30) 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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
Organic compounds	2.00

**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.

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
T007 - 466,200 gallon storage tank with internal floating roof	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-21-09(L)  40 CFR Part 60 Subpart Kb	Volatile organic compound (VOC) emissions shall not exceed 1.5 tons per year.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart Kb.  See A.2. below

**2. Additional Terms and Conditions**

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

- iv. The internal floating roof shall be equipped with a dual seal system which has a primary seal with secondary seal. The primary seal is a flexible wiper and the secondary seal is a rim-mounted flexible wiper. The two seals must be mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof.
  - v. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
  - vi. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
  - vii. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
  - viii. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
  - ix. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sampling well shall have a slit fabric cover that covers at least 90% of the opening.
  - x. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
  - xi. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 2.b** The permittee shall not place, store, or hold any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute in T007 unless such tank, is designed or equipped with an internal floating roof and the following conditions are met:
- i. the automatic bleeder vents are to be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, are to be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.

- ii. All openings, except stub drains, are to be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

**B. Operational Restrictions**

1. The vapor pressure of any material stored in this emissions unit shall not exceed 42.76 kPa (6.2 psia).

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. The name and identification of each petroleum liquid stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.
  - c. The throughput in gallons of each petroleum liquid stored.
2. The permittee shall maintain the following records for the life of the source:
  - a. The dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
3. For a two year period, the permittee shall keep a record of the inspection performed as required by 60.113b(a)(1). Each record shall identify the following information:
  - a. tank on which the inspection was performed
  - b. date the tank was inspected
  - c. observed condition of each component of the control equipment (seals, internal floating roof and fittings).

**D. Reporting Requirements**

1. The permittee shall furnish the Director (the appropriate Ohio EPA District Office or local air agency) with a report that describes the control equipment and certifies that the control equipment meets the specifications of 60.112b(a)(1) and 60.113b(a)(1). This report shall be an attachment to the notification required by 60.7(a)(3).
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the internal floating roof, primary and/or secondary seals and seal(s) specifications which documents a violation of the applicable control equipment requirements. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of any exceedance of the vapor pressure as outlined in this permit. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

**E. Testing Requirements**

1. 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 - 1.5 tpy of VOC  
  
Applicable Compliance Method -  
Compliance with the emission limitation shall be demonstrated by the use of USEPA "Tanks Program 3.1."
2. Compliance with the control measure requirements in section A.2. of these terms and conditions shall be demonstrated by a review of facility records during a facility compliance inspection and record keeping requirements outlined in C.

**F. Miscellaneous Requirements**

1. After installing the control equipment required to meet 60.112b(a)(1) (permanently affixed roof and internal floating roof) the permittee shall comply with the testing and procedure requirements of 60.113b(a)(1) - 60.113b(a)(5).

**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.

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
T008 - 315,000 gallon storage tank with external floating roof tank	OAC rule 3745-31-05 (A)(3)          OAC rule 3745-21-09(L)          40 CFR Part 60 Subpart Kb	Annual volatile organic compound emissions shall not exceed 0.5 ton per year.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.  Same as, or less stringent than those outlined in 40 CFR Part 60, Subpart Kb.  See A.2.

**2. Additional Terms and Conditions**

- 2.a This storage tank shall be equipped with an external floating roof meeting the following specifications:
  - (1) each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as a primary seal, and the upper seal is referred to as the secondary seal.
    - i. the primary seal shall be a mechanical shoe seal; except as provided in 60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and a tank wall.
    - ii. the secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in 60.113b(b)(4).
  - (2) except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for

automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e. no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

- (3) the roof shall be floating on the liquid at all times except during the initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

**2.b** The permittee shall not place, store, or hold any petroleum liquid in T008, unless the tank is designed or equipped with a mechanical shoe primary seal and a rim-mounted secondary seal that meet the following requirements:

- (1) There are no visible holes, tears, or other openings in the seal or seal fabric;
- (2) If the tank is of welded construction, the total seal gap area, as determined under paragraph (I) of rule 3745-21-10 of the Administrative Code, does not exceed:
  - (i) 10.0 square inches per foot of tank diameter for a liquid-mounted primary seal or mechanical shoe primary seal;
  - (ii) 1.0 square inch per foot of tank diameter for a rim-mounted secondary seal or shoe-mounted secondary seal.
- (3) If the tank is of riveted construction, the maximum seal gap width, as determined under paragraph (I) of rule 3745-21-10 of the Administrative Code, does not exceed:
  - (i) 2.5 inches for a mechanical shoe primary seal; or
  - (ii) 1.5 inches for a liquid-mounted primary seal, vapor-mounted primary seal, flexible wiper primary seal, shoe-mounted secondary seal or rim-mounted secondary seal.

**2.c** Any opening in the external floating roof, except automatic bleeder vents, rim space vents, leg sleeves, stub drains and slotted gauging/sampling wells, is equipped with:

- (1) A cover, seal or lid which remains in the closed position at all times without any visible gaps, except when the opening is in actual use; and

(2) A projection into the tank below the liquid surface.

- 2.d** Any automatic bleeder vent remains in the closed position, except when the external floating roof is floated off or landed on the roof leg supports;
- 2.e** Any rim vent is set to open only at the manufacturer's recommended setting, except when the external floating roof is being floated off the roof leg supports;
- 2.f** Any emergency roof drain is equipped with a slotted membrane fabric cover or other device which covers at least ninety per cent of the area of the opening;
- 2.g** Any stub drain is equipped with a projection into the tank below the liquid surface; and
- 2.h** Any slotted gauging/sampling well is equipped with an object which floats on the liquid surface within the well and which covers at least ninety per cent of the area of the well opening.

## **B. Operational Restrictions**

- 1. The vapor pressure of any material stored in this emissions unit shall not exceed 42.76 kPa (6.2 psia).

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. Each owner or operator of an external floating roof tank which contains a petroleum liquid shall meet the following inspection, record keeping requirements:
  - a. Inspect annually any seal and seal fabric for compliance with A.2.b.1. ;
  - b. Measure annually, in accordance with the method specified in paragraph (I) of rule 3745-21-10 of the Administrative Code, the secondary seal gap or the primary seal gap;
  - c. Measure at least once every five years, in accordance with the method specified in paragraph (I) of rule 3745-21-10 of the Administrative Code, the primary seal gap, if there is a secondary seal, for compliance with the seal gap requirements of paragraph 3745-21-09(Z)(1)(b)(ii) or 3745-21-09(Z)(1)(b)(iii) of this rule;
  - d. Maintain for at least two years a record of the following:
    - (i) The dates and results of any inspections or measurements performed in accordance with paragraphs 3745-21-09(Z)(2)(a) to (Z)(2)(c) of this rule; and
    - (ii) The annual throughput of any petroleum liquid stored in the tank.

- e. Provide immediately to the director or an authorized representative of the director, upon written or verbal request at any reasonable time, a copy of the record required under paragraph 3745-21-09(Z)(2)(d).
2. The permittee shall maintain monthly records of the following information:
  - a. The name and identification of each petroleum liquid stored in the tank.
  - b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.
  - c. The throughput in gallons of each petroleum liquid stored.
3. The permittee shall maintain the following records for the life of the source:
  - a. The dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

#### **D. Reporting Requirements**

1. Furnish the Director (the appropriate Ohio EPA District Office or local air agency) with a report that describes the control equipment and certifies that the control equipment meets the specifications of 60.112b(a)(2) and 60.113b(b)(2), (b)(3) and (b)(4). This report shall be an attachment to the notification required by 60.7(a)(3).
2. Within 60 days of performing the seal gap measurements required by 60.113b(b)(1), furnish the Director (the appropriate Ohio EPA District Office or local air agency) with a report that contains:
  - a. the date of measurement
  - b. the raw data obtained in the measurement
  - c. the calculations described in 60.113b(b)(2) and 60.113b(b)(3).
3. Keep a record of each gap measurement performed as required by 60.113b(b). Each record shall identify the storage vessel in which the measurement was performed and shall contain:
  - a. the date of measurement
  - b. the raw data obtained in the measurement
  - c. the calculations described in 60.113b(b)(2) and 60.113b(b)(3).
4. After each seal gap measurement that detects gaps exceeding the limitations specified by 60.113b(b)(4), submit a report to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the inspection. The report will identify the vessel and contain the information specified in D.2. and the date the vessel was emptied or the repair made and date of repair.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of any exceedance of the vapor pressure as outlined in this permit. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

**E. Testing Requirements**

1. 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 - 0.5 tpy of VOC  
  
Applicable Compliance Method -  
Compliance with the emission limitation shall be demonstrated by the use of USEPA "Tanks Program 3.1."
2. Compliance with the control measure requirements in section A.2. of these terms and conditions shall be demonstrated by a review of facility records during a facility compliance inspection and record keeping requirements outlined in C.

**F. Miscellaneous Requirements**

1. After installing the control equipment required to meet 60.112b(a)(2) (external floating roof) the permittee shall comply with the testing and procedure requirements of 60.113b(b)(1) - 60.113b(b)(6).





**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08235

Facility ID: 0125040239

FACILITY NAME BP Columbus Terminal

FACILITY DESCRIPTION Bulk Gasoline Terminal

CITY/TWP Columbus

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electroni</u> <u>c</u>	<u>Additional information File</u> <u>Name Convention (your PTI</u> <u># plus this letter)</u>	<u>Hard</u> <u>Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

The BP Oil Company is a bulk gasoline terminal located in Columbus, Ohio. This facility received a FESOP to avoid Title V. In the FESOP, the facility's gasoline loading rack was limited to 82.9 tpy. Overall facility emissions were quantified to be 97.0 based on the restriction on the loading rack and assuming that T007 and T008 hold gasoline even though they are only permitted for jet fuel. Therefore, even there will be an increase in emissions from permitting T007 and T008 to store gasoline, the pte from the Columbus Terminal will still not exceed the 100 tons per year, and thus will remain a non-Title V facility.

Applicable Federal Rules and Regulations(1) NSPS - 60.110b

Tank &gt; or = 10568 gallons, YES

Does tank store volatile organic liquid (VOL), YES

Tank modified or constructed after 7-23-84, YES

Not one of the exempt facilities or vessels.

NSPS Kb applies to the affected facility

NSPS - 60.112b

Tank &gt; 39,800 gallons, YES

Vapor pressure (VP) &gt; 5.2 kPa (0.76 psi) but &lt; 76.6 kPa (11.26 psi), YES (tank will contain Gasoline RVP 13)

NSPS Kb, 60.112b(a) applies to the affected facility which allows for three ways to comply

1. 60.112b(a)(1)

2. 60.112b(a)(2) or

3. 60.112b(a)(3)

**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08235

Facility ID: 0125040239

FACILITY NAME BP Columbus Terminal

FACILITY DESCRIPTION Bulk Gasoline Terminal

CITY/TWP Columbus

**T007 will comply with 60.112b(a) by having a fixed roof tank in conjunction with an internal floating roof - 60.112b(a)(1)**

**Must comply with 60.112b(a)(1)(i)**

**Complies with 60.112b(a)(1)(ii) by having a primary seal of a flexible wiper and a secondary seal of a rim-mounted, flexible wiper.**

**T008 will comply with 60.112b(a) by having an external floating roof - 60.112b(a)(2)**

**Complies with 60.112b(a)(2)(i) by having dual seals (primary seal w/ second shield mounted above it; the primary seal is a mechanical shoe and the secondary seal is a rim-mounted, flexible wiper.**

**Must comply with 60.112b(a)(2)(ii) and 60.112b(a)(2)(iii)**

**NSPS - 60.113b**

**60.112b(a) requires compliance with the testing and procedures of this section**

**NSPS - 60.115b - must comply**

**NSPS - 60.116b - must comply**

(2) NESHAPS - n/a

(3) PSD

----- Is the facility in an attainment area? YES

----- Facility on 28 Source Category PSD Rule List? NO

----- Current facility PTE > 250 tpy of organic compounds?

**No, this source has a FESOP which limits organic compound emissions under 100 tpy, individual HAP emissions not to exceed 10 tpy and total annual HAP emissions not to exceed 25 tons per year.**

● Facility is not a PSD facility

----- New source potential emissions >= 250 tpy? NO

● Not a Major Modification - No PSD Permit Needed

**Applicable State Rules and Regulations**

**T007 emits organic compounds.**

**OAC rule 3745-21-09(L) - Storage of petroleum liquids in fixed roof tanks. This tank is listed as an internal floating roof tank; however based on its capacity and the vapor pressure of**

**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08235

Facility ID: 0125040239

FACILITY NAME BP Columbus Terminal

FACILITY DESCRIPTION Bulk Gasoline Terminal

CITY/TWP Columbus

the material stored in it, NSPS requires it to have a fixed roof.

**T008 emits organic compounds**

**OAC rule 3745-21-09(Z) - Storage of petroleum liquids in external floating roof tanks. This tank is listed as an external floating roof tank.**

**Please complete:**

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic compounds	2.00