



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
COLUMBIANA COUNTY
Application No: 02-14761**

CERTIFIED MAIL

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

DATE: 7/31/2001

TransMontaigne Terminaling Inc
Bill Grygar
280 North College Ave Suite 500
Fayetteville, AR 72701

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

NEDO



Permit To Install
Terms and Conditions

Issue Date: 7/31/2001
Effective Date: 7/31/2001

FINAL PERMIT TO INSTALL 02-14761

Application Number: 02-14761
APS Premise Number: 0215020249
Permit Fee: **\$1350**
Name of Facility: TransMontaigne Terminaling Inc
Person to Contact: Bill Grygar
Address: 280 North College Ave Suite 500
Fayetteville, AR 72701

Location of proposed air contaminant source(s) [emissions unit(s)]:
425 River Rd
East Liverpool, Ohio

Description of proposed emissions unit(s):
3 Loading racks and one storage tank for liquid organic and inorganic materials.

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 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 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**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------------------|----------------------|
| Organic Compounds | 99.99 |

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|---|
| J002 - Loading Rack #1 for material (organic and inorganic) that has a vapor pressure less than 1.5 psia. | OAC rule 3745-31-05(A)(3) | Emissions of organic compounds shall not exceed 52.08 pounds per hour and 26.44 tons per year as a rolling, 365-day summation. All loading shall utilize submerged fill. |
| | OAC rule 3745-21-07(E) | Exempt, see A.2.a |
| | OAC rule 3745-35-07(B) | See 2.b below. |
| | 40 CFR, Part 60, Subpart Kb | Exempt, vapor pressure of organic material loaded shall not meet or exceed 1.5 pounds per square inch absolute. |

2. Additional Terms and Conditions

- 2.a The facility shall not load volatile photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tons per year (TPY) as a rolling, 365-day summation for any single HAP and less than 25 TPY as a rolling, 365-day summation for the combination of all HAPs.

B. Operational Restrictions

1. The actual emissions of organic compounds from this facility shall be less than 100 TPY, as a rolling, 365-day summation.
2. This emissions unit shall not service material that has a vapor pressure that equals or exceeds 1.5 pounds per square inch absolute when measured at 60 degrees Fahrenheit.
3. This emissions unit shall not exceed 24,368,112 gallons loaded per year as a rolling, 365-day summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall, on a daily basis, record the following:
 - a. the amount of material, in gallons, loaded;
 - b. the name of the material loaded;
 - c. the vapor pressure of the material loaded, in psia;
 - d. the molecular weight of the material loaded,
 - e. the average temperature of the material loaded; and,
 - f. the amount of material, in gallons, loaded per year as a rolling, 365-day summation.
2. The permittee shall maintain records of accumulative organic emissions from this emissions unit for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
3. The permittee shall maintain records of accumulative facility organic emissions for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
4. The permittee shall maintain records of accumulative facility individual hazardous air pollutants and aggregate hazardous air pollutants for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of individual hazardous air pollutants and aggregate hazardous air pollutants emissions beginning after the first 365 days of operation following the issuance of this permit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the material loaded exceeded 1.5 pounds per square inch absolute.

2. The permittee shall submit deviation (excursion) reports that identify if the emissions unit exceeds 24,368,112 gallons loaded per year as a rolling, 365-day summation.
3. The permittee shall report to the Ohio EPA Northeast District Office if the pump that services this emissions unit exceeds the current maximum rate of 400 gallons per minute.
4. The permittee shall submit deviation (excursion) reports that identify if the mass emissions limitation of 26.44 TPY as a rolling, 365 day summation is exceeded.
5. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of any one HAP equals or exceeds 10 TPY and if the rolling, 365-day emissions of all HAPs equals or exceeds 25 TPY from this facility.
6. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of organic compounds equals or exceeds 100 TPY.

E. Testing Requirements

1. Emission Limitation: Emissions of organic compounds shall not exceed 52.08 pounds per hour.

Applicable Compliance Method: Compliance with the pounds per hour limitation is based on worst case allowable conditions: material vapor pressure not to exceed 1.5 psia and amount of material loaded not to exceed 400 gallons per minute. Calculations utilize AP-42, section 5.2 - **Transportation and Marketing of Petroleum Liquids**, version 1/1995.

2. Emission Limitation: Emissions of organic compounds from this emissions unit shall not exceed 26.44 tons per year as a rolling 365-day summation.

Applicable Compliance Method: Compliance shall be determined by using the following equation:

$$\text{summation (TPY}_i) = [A_i \times L_i]/2000, \quad \text{where}$$

TPY_i = tons per year of organic compounds

A_i = annual throughput as a rolling, 365-day summation of liquid i

2000 = conversion factor (pounds per ton)

L_i = Loading loss emission factor for liquid i (lb/1000 gallon) where,

$$L_i = [12.46 \times S \times P_i \times M_i]/T_i, \quad \text{where}$$

S = Saturation factor for submerged loading (0.60)

Pi = True vapor pressure of liquid i loaded (psia)

Mi = Molecular weight of liquid i loaded (lb/lb-mole)

Ti = Temperature of bulk liquid i loaded (degrees R)

3. Emission Limitation: Emissions of any one hazardous air pollutants shall not equal or exceed 10 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

4. Emission Limitation: Emissions of all hazardous air pollutants shall not equal or exceed 25 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

5. Emission Limitation: Emissions of organic compounds shall not equal or exceed 100 TPY.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.4 of the terms and conditions of this permit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|---|
| J003 - Loading Rack #2 for materials (organic and inorganic) that has a vapor pressure less than 1.5 psia | OAC rule 3745-31-05(A)(3) | Emissions of organic compounds shall not exceed 84.63 pounds per hour and 26.44 tons per year as a rolling, 365-day summation. All loading shall utilize submerged fill. |
| | OAC rule 3745-21-07(E) | Exempt, see A.2.a |
| | OAC rule 3745-35-07(B) | See 2.b below. |
| | 40 CFR, Part 60, Subpart K | Exempt, vapor pressure of organic material loaded shall not meet or exceed 1.5 pounds per square inch absolute. |

2. Additional Terms and Conditions

- 2.a The facility shall not load volatile photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tons per year (TPY) as a rolling, 365-day summation for any single HAP and less than 25 TPY as a rolling, 365-day summation for the combination of all HAPs.

B. Operational Restrictions

1. The actual emissions of organic compounds from this facility shall not equal or exceed 100 TPY, as a rolling, 365-day summation.
2. This emissions unit shall not service material that has a vapor pressure that equals or exceeds 1.5 pounds per square inch absolute when measured at 60 degrees Fahrenheit.
3. This emissions unit shall not exceed 24,368,112 gallons loaded per year as a rolling, 365-day summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall, on a daily basis, record the following:
 - a. the amount of material, in gallons, loaded;
 - b. the name of the material loaded;
 - c. the vapor pressure of the material loaded, in psia;
 - d. the molecular weight of the material loaded,
 - e. the average temperature of the material loaded; and,
 - f. the amount of material, in gallons, loaded per year as a rolling, 365-day summation.
2. The permittee shall maintain records of accumulative organic emissions from this emissions unit for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
3. The permittee shall maintain records of accumulative facility organic emissions for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
4. The permittee shall maintain records of accumulative facility individual hazardous air pollutants and aggregate hazardous air pollutants for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of individual hazardous air pollutants and aggregate hazardous air pollutants emissions beginning after the first 365 days of operation following the issuance of this permit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the material loaded exceeded 1.5 pounds per square inch absolute.

2. The permittee shall submit deviation (excursion) reports that identify if the emissions unit exceeds 24,368,112 gallons loaded per year as a rolling, 365-day summation.
3. The permittee shall report to the Ohio EPA Northeast District Office if the pump that services this emissions unit exceeds the current maximum rate of 650 gallons per minute.
4. The permittee shall submit deviation (excursion) reports that identify if the mass emissions limitation of 26.44 TPY as a rolling, 365 day summation is exceeded.
5. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of any one HAP equals or exceeds 10 TPY and if the rolling, 365-day emissions of all HAPs equals or exceeds 25 TPY from this facility.
6. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of organic compounds equals or exceeds 100 TPY.

E. Testing Requirements

1. Emission Limitation: Emissions of organic compounds shall not exceed 84.63 pounds per hour.

Applicable Compliance Method: Compliance with the pounds per hour limitation is based on worst case allowable conditions of material vapor pressure not to exceed 1.5 psia and amount of material loaded does not exceed 650 gallons per minute. Calculations utilize AP-42, section 5.2 - **Transportation and Marketing of Petroleum Liquids**, version 1/1995.

2. Emission Limitation: Emissions of organic compounds from this emissions unit shall not exceed 26.44 tons per year as a rolling 365-day summation.

Applicable Compliance Method: Compliance shall be determined by using the following equation:

$$\text{summation (TPY}_i) = [A_i \times L_i]/2000, \quad \text{where}$$

TPY_i = tons per year of organic compounds
A_i = annual throughput as a rolling, 365-day summation of liquid i
2000 = conversion factor (pounds per ton)
L_i = Loading loss emission factor for liquid i (lb/1000 gallon) where,

$$L_i = [12.46 \times S \times P_i \times M_i]/T_i, \quad \text{where}$$

S = Saturation factor for submerged loading (0.60)

Pi = True vapor pressure of liquid i loaded (psia)

Mi = Molecular weight of liquid i loaded (lb/lb-mole)

Ti = Temperature of bulk liquid i loaded (degrees R)

3. Emission Limitation: Emissions of any one hazardous air pollutants shall not equal or exceed 10 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

4. Emission Limitation: Emissions of all hazardous air pollutants shall not equal or exceed 25 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

5. Emission Limitation: Emissions of organic compounds shall not equal or exceed 100 TPY.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.4 of the terms and conditions of this permit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|---|
| J004 - Loading Rack #3 for materials (organic and inorganic) that has a vapor pressure less than 1.5 psia | OAC rule 3745-31-05(A)(3) | Emissions of organic compounds shall not exceed 58.59 pounds per hour and 26.44 tons per year as a rolling, 365-day summation. All loading shall utilize submerged fill. |
| | OAC rule 3745-21-07(E) | Exempt, see A.2.a |
| | OAC rule 3745-35-07(B) | See 2.b below. |
| | 40 CFR, Part 60, Subpart Kb | Exempt, vapor pressure of organic material loaded shall not meet or exceed 1.5 pounds per square inch absolute. |

2. Additional Terms and Conditions

- 2.a The facility shall not load volatile photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tons per year (TPY) as a rolling, 365-day summation for any single HAP and less than 25 TPY as a rolling, 365-day summation for the combination of all HAPs.

B. Operational Restrictions

1. The actual emissions of organic compounds from this facility shall not equal or exceed 100 TPY, as a rolling, 365-day summation.
2. This emissions unit shall not service material that has a vapor pressure that equals or exceeds 1.5 pounds per square inch absolute when measured at 60 degrees Fahrenheit.
3. This emissions unit shall not exceed 24,368,112 gallons loaded per year as a rolling, 365-day summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall, on a daily basis, record the following:
 - a. the amount of material, in gallons, loaded;
 - b. the name of the material loaded;
 - c. the vapor pressure of the material loaded, in psia;
 - d. the molecular weight of the material loaded,
 - e. the average temperature of the material loaded; and,
 - f. the amount of material, in gallons, loaded per year as a rolling, 365-day summation.
2. The permittee shall maintain records of accumulative organic emissions from this emissions unit for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
3. The permittee shall maintain records of accumulative facility organic emissions for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of organic compounds emissions beginning after the first 365 days of operation following the issuance of this permit.
4. The permittee shall maintain records of accumulative facility individual hazardous air pollutants and aggregate hazardous air pollutants for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of individual hazardous air pollutants and aggregate hazardous air pollutants emissions beginning after the first 365 days of operation following the issuance of this permit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the material loaded exceeded 1.5 pounds per square inch absolute.

2. The permittee shall submit deviation (excursion) reports that identify if the emissions unit exceeds 24,368,112 gallons loaded per year as a rolling, 365-day summation.
3. The permittee shall report to the Ohio EPA Northeast District Office if the pump that services this emissions unit exceeds the current maximum rate of 450 gallons per minute.
4. The permittee shall submit deviation (excursion) reports that identify if the mass emissions limitation of 26.44 TPY as a rolling, 365 day summation is exceeded.
5. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of any one HAP equals or exceeds 10 TPY and if the rolling, 365-day emissions of all HAPs equals or exceeds 25 TPY from this facility.
6. The permittee shall submit deviation (excursion) reports that identify if the rolling, 365-day emissions of organic compounds equals or exceeds 100 TPY.

E. Testing Requirements

1. Emission Limitation: Emissions of organic compounds shall not exceed 58.59 pounds per hour.

Applicable Compliance Method: Compliance with the pounds per hour limitation is based on worst case allowable conditions of material vapor pressure not to exceed 1.5 psia and amount of material loaded does not exceed 450 gallons per minute. Calculations utilize AP-42, section 5.2 - **Transportation and Marketing of Petroleum Liquids**, version 1/1995.

2. Emission Limitation: Emissions of organic compounds from this emissions unit shall not exceed 26.44 tons per year as a rolling 365-day summation.

Applicable Compliance Method: Compliance shall be determined by using the following equation:

$$\text{summation (TPY}_i) = [A_i \times L_i]/2000, \quad \text{where}$$

TPY_i = tons per year of organic compounds
A_i = annual throughput as a rolling, 365-day summation of liquid i
2000 = conversion factor (pounds per ton)
L_i = Loading loss emission factor for liquid i (lb/1000 gallon) where,

$$L_i = [12.46 \times S \times P_i \times M_i]/T_i, \quad \text{where}$$

S = Saturation factor for submerged loading (0.60)

Pi = True vapor pressure of liquid i loaded (psia)

Mi = Molecular weight of liquid i loaded (lb/lb-mole)

Ti = Temperature of bulk liquid i loaded (degrees R)

3. Emission Limitation: Emissions of any one hazardous air pollutants shall not equal or exceed 10 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

4. Emission Limitation: Emissions of all hazardous air pollutants shall not equal or exceed 25 tons per year as a rolling, 365-day summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.5 of the terms and conditions of this permit.

5. Emission Limitation: Emissions of organic compounds shall not equal or exceed 100 TPY.

Applicable Compliance Method: Compliance shall be determined by the record keeping requirements in section C.4 of the terms and conditions of this permit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| T015 - Tank #3 for bulk storage of liquids. 24,000 barrels, fixed roof. | OAC rule 3745-31-05(A)(3) | Emissions of organic compounds shall not exceed 49.84 tons per year. All tank loading shall utilize submerged fill. |
| | OAC rule 3745-35-07(B) | See 2.a below. |
| | OAC rule 3745-21-09(L)(1) | Exempt, vapor pressure of all stored liquids are not to equal or exceed 1.5 psia. |
| | 40 CFR, Part 60, Subpart K | Exempt, vapor pressure of all stored liquids are not to equal or exceed 1.5 psia. |

2. **Additional Terms and Conditions**

- 2.a The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tons per year (TPY) as a rolling, 365-day summation for any single HAP and less than 25 TPY as a rolling, 365-day summation for the combination of all HAPs.

B. Operational Restrictions

1. The permittee shall not place, store, or hold in this fixed roof tank any liquid which, as stored, has a true vapor pressure greater than 1.5 pounds per square inch absolute, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall record monthly the amount of material, in gallons, transferred into and out of the storage tank.
2. The permittee shall record the types of materials stored in the tank and the vapor pressure of the material stored within the storage tank.
3. The permittee shall maintain records of the accumulative organic emissions for the first 12 months of operation following the issuance of this permit and of the rolling, 12-month summation of organic compounds emissions beginning after the first 12 calendar months of operation following the issuance of this permit.
4. The permittee shall maintain records of accumulative facility individual hazardous air pollutants and aggregate hazardous air pollutants for the first 365 days of operation following the issuance of this permit and of the rolling, 365-day summation of individual hazardous air pollutants and aggregate hazardous air pollutants emissions beginning after the first 365 days of operation following the issuance of this permit.

D. Reporting Requirements

1. If the permittee places, stores, or holds in the fixed roof tank any liquid with a true vapor pressure which is greater than 1.5 pounds per square inch absolute, and such tank does comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Northeast District Office of the Ohio EPA within 30 days of becoming aware of the occurrence.

E. Testing Requirements

1. Emission Limitation: Emissions of organic compounds shall not exceed 49.84 tons per year.

Applicable Compliance Method: Compliance with the yearly emissions rate within this permit to install shall be calculated using the Tanks 3.0 computer program or equivalent method that is acceptable by the Ohio EPA.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14761

Facility ID: 0215020249

FACILITY NAME TransMontaigne Terminating Inc

FACILITY DESCRIPTION 3 Loading racks and one storage tank for liquid organic and inorganic materials CITY/TWP East Liverpool

SIC CODE 4226 SCC CODE 4-04-002-50 EMISSIONS UNIT ID J002

EMISSIONS UNIT DESCRIPTION Loading Rack for material that has a vapor pressure less than 1.5 psia.

DATE INSTALLED 08/1990

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | 0.0 lb/hr | 0.0 TPY | 52.08 lbs/hr | 26.44 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Submerged fill, Loading rack shall not service liquids with a liquid vapor pressure above 1.5 psia when measured at 60 degrees F.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14761

Facility ID: 0215020249

FACILITY NAME TransMontaigne Terminaling Inc

FACILITY DESCRIPTION 3 Loading racks and one storage tank for liquid organic and inorganic materials CITY/TWP East Liverpool

SIC CODE 4226 SCC CODE 4-04-002-50 EMISSIONS UNIT ID J003

EMISSIONS UNIT DESCRIPTION Loading Rack for materials with a vapor pressure less than 1.5 psia

DATE INSTALLED 01/1977

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | 0.0 lb/hr | 0.0 TPY | 84.63 lbs/hr | 26.44 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Submerged fill, Loading rack shall not service liquids with a liquid vapor pressure above 1.5 psia when measured at 60 degrees F.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14761

Facility ID: 0215020249

FACILITY NAME TransMontaigne Terminaling Inc

FACILITY DESCRIPTION 3 Loading racks and one storage tank for liquid organic and inorganic materials CITY/TWP East Liverpool

SIC CODE 4226 SCC CODE 4-04-002-50 EMISSIONS UNIT ID J004

EMISSIONS UNIT DESCRIPTION Loading rack for materials with a vapor pressure less than 1.5 psia.

DATE INSTALLED 07/1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | 0.09 lb/hr | 0.4 TPY | 58.59 lbs/hr | 26.44 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Submerged fill, Loading rack shall not service liquids with a liquid vapor pressure above 1.5 psia when measured at 60 degrees F.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14761

Facility ID: 0215020249

FACILITY NAME TransMontaigne Terminating Inc

FACILITY DESCRIPTION 3 Loading racks and one storage tank for liquid organic and inorganic materials CITY/TWP East Liverpool

SIC CODE 4226 SCC CODE _____ EMISSIONS UNIT ID T015

EMISSIONS UNIT DESCRIPTION Bulk storage of liquids 24,000 barrels, fixed roof

DATE INSTALLED 01/1977

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | attainment | Not Req'd | 0.0 TPY | Not Req'd | 49.84 TPY |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Submerged fill, Storage Tank shall not service liquids with a vapor pressure equal to or greater than 1.5 psia when measured at 60 degrees F.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____