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
ALLEN COUNTY
Application No: 03-13429

CERTIFIED MAIL

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

DATE: 6/14/00

Marathon Ashland Pipe Line LLC
Ames E. Brown
2990 South Dixie Highway
Lima, OH 43056

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

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

CC: USEPA **NWDO**

FINAL PERMIT TO INSTALL 03-13429

Application Number:	03-13429
APS Premise Number:	0302020032
Permit Fee:	**$350**
Name of Facility:	Marathon Ashland Pipe Line LLC
Person to Contact:	Ames E. Brown
Address:	2990 South Dixie Highway Lima, OH 43056

Location of proposed air contaminant source(s) [emissions unit(s)]:
2990 South Dixie Highway
Lima, **Ohio**

Description of proposed emissions unit(s):
Modification of existing 420,000 gallon fixed roof petroleum vapor relief tank into an internal floating roof tank.

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

Pollutant	Tons Per Year
OC	**1.23**

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
T026 - 420,000 gallon internal floating roof storage tank #20 (modification). Modification involves conversion of an existing fixed roof tank to an internal floating roof.	OAC rule 3745-31-05(A)	1.23 tons organic compounds (OC)/year
	OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part, Subpart Kb
	OAC rule 3745-21-09(L)	internal floating roof (see A.2.a below)
	40 CFR Part 60, Subpart Kb	record keeping requirements (see C.2.)

2. Additional Terms and Conditions

2.a The permittee shall modify emissions unit T026 to comply with the following control equipment requirements:

i. a fixed roof in combination with an internal floating roof meeting the following specifications:

aa. the internal floating roof shall be equipped with a mechanical shoe seal closure device between the wall of the storage tank and the edge of the internal floating roof [40 CFR 60.112b(a)(1)(ii)(C)];

ab. the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a)(1)(i)];

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ac. each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface [40 CFR 60.112b(a)(1)(iii)];

ad. 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 gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Cover on each access hatch and automatic gauge float well shall be bolted except when they are in use [40 CFR 60.112b(a)(1)(iv)];

ae. 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 [40 CFR 60.112b(a)(1)(v)];

af. 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 [40 CFR 60.112b(a)(1)(vi)];

ag. each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [40 CFR 60.112b(a)(1)(vii)];

ah. 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 [40 CFR 60.112b(a)(1)(viii)]; and,

ai. each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]

B. Operational Restrictions

1. If the inspection required in Section C.1.a. of this permit reveals holes, tears, or other openings in the primary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage tank. [40 CFR 60.113b(a)(1)]

2. If the inspection required in Section C.1.b. of this permit detects any failures, the permittee shall repair the items or empty and remove the storage tank from service within 45 days. If a failure cannot be repaired within 45 days and if the storage tank cannot be emptied within 45 days, a 30-day extension may be requested in the inspection report required by Section D.3. of this permit. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the storage tank will be emptied as soon as possible. [40 CFR 60.113b(a)(2)]

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3. If the inspection required in Section C.1.c. of this permit detects any failures, the permittee shall repair the items as necessary so that none of the defects exist before refilling the storage tank with volatile organic liquid (VOL). [40 CFR 60.113b(a)(4)]

4. The maximum annual throughput for this emissions unit shall not exceed 424,200 gallons of material.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee is subject to the following inspection requirements:

   a. the internal floating roof and the primary seal shall be visually inspected for holes, tears, or other openings in the primary seal, or the seal fabric or defects in the internal floating roof prior to filling the storage tank with volatile organic liquid. [40 CFR 60.113b(a)(1)]

   b. the internal floating roof and the primary seal shall be visually inspected through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. The inspection shall be performed to detect the following failures:

      i. the internal floating roof is not resting on the surface of the VOL inside the storage tank;

      ii. liquid has accumulated on the roof;

      iii. the seal is detached; and,

      iv. there are holes or tears in the seal fabric. [40 CFR 60.113b(a)(2)]

   c. the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals shall be visually inspected each time the storage tank is emptied and degassed (in no event shall inspections conducted in accordance with this requirement occur at intervals greater than 10 years). The inspection shall be performed to detect the following failures:

      i. internal floating roof defects;

      ii. holes, tears, or other openings in the seal or the seal fabric;

      iii. gaskets no longer close off the liquid surfaces from the atmosphere; and,

      iv. slotted membrane has more than 10 percent open area. [40 CFR 60.113b(a)(4)]

2. The permittee shall record and maintain records of the annual throughput of petroleum liquid stored in this emissions unit. [OAC rule 3745-31-05]

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3. The permittee shall keep a record of each inspection performed as required by Section C.1. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]

4. The permittee shall keep readily accessible records showing the dimensions of the storage tank and an analysis showing the capacity of the storage tank. These records shall be maintained for the life of the storage tank. [40 CFR 60.116b(a)&(b)]

5. The permittee shall maintain the following records for this emissions unit:

   a. identification of VOL stored;

   b. time period of storage; and,

   c. maximum true vapor pressure of VOL during the respective storage period. [40 CFR 60.116b(c)]

D. Reporting Requirements

1. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the U.S. EPA, 40 CFR Part 60, are delegated to the Ohio EPA. The requirements for 40 CFR Part 60 are also federally enforceable.

   Pursuant to the NSPS, the permittee is hereby advised of the requirement to report the following at the appropriate times:

   a. dates modification construction commenced postmarked no later than 30 days after such date;

   b. anticipated date of initial startup postmarked not more than 60 days nor less than 30 days prior to such date;

   c. actual date of initial startup postmarked within 15 days after such date. [40 CFR 60.7(a)]; and,

   d. date of performance testing (if required, at least 30 days prior to testing).

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2. The permittee shall provide written notification at least 30 calendar days prior to the filling or refilling of a storage tank for which an inspection is required by Section C.1.a or Section C.1.c of this permit. If the inspection required by Section C.1.c is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the storage tank, the permittee shall notify the Ohio EPA at least 7 days prior to the refilling of the storage tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

3. After installing control equipment required by Section A.2.a, the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of Section A.2.a and Section B.1. This report shall be an attachment to the notification required by Section D.1.c. [40 CFR 60.115b(a)(1)]

4. If the annual inspection required by Section C.1.b reveals any failures as outlined by Section C.1.b i., ii., iii., and iv., a report shall be submitted within 30 days of the inspection. Each report shall identify the storage tank, the nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation</u>
   1.23 ton OC/year

   <u>Applicable Compliance Method</u>
   The emission limitation was established in accordance with U.S. EPA, TANKS 4.0 computer program using a maximum annual throughput of 424,200 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and record keeping requirements specified in Section C.2.

   b. <u>Emission Limitation</u>
   Storage vessel emission control (internal floating roof)

   <u>Applicable Compliance Method</u>
   Compliance with the requirement to install and operate an internal floating roof shall be demonstrated by the monitoring and record keeping requirements specified in Section C.1.

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F. Miscellaneous Requirements

1. 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.

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NEW SOURCE REVIEW FORM B

PTI Number: 03-13429

Facility ID: 0302020032

FACILITY NAME Marathon Ashland Pipeline LLC

FACILITY DESCRIPTION Modification of existing 420,000 gallon fixed roof petroleum vapor relief tank into an internal floating roof tank.

CITY/TWP Lima

SIC CODE 4613

SCC CODE 4-04-001-11 and 4-04-001-16

EMISSIONS UNIT ID T026

EMISSIONS UNIT DESCRIPTION Modification of existing 420,000 gallon fixed roof petroleum vapor relief tank into an internal floating roof tank.

DATE INSTALLED 08/21/00

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		1.23		1.23
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subpart Kb NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?	
Enter Determination	Use of internal floating roof

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ None

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: 03-13429 Facility ID: 0302020032

FACILITY NAME Marathon Ashland Pipeline LLC

FACILITY DESCRIPTION Modification of existing 420,000 gallon fixed roof petroleum vapor relief tank into an internal floating roof tank. CITY/TWP Lima

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**

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

* 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

See permit review forms

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:
NONE

NEW SOURCE REVIEW FORM B

PTI Number: 03-13429

Facility ID: 0302020032

FACILITY NAME Marathon Ashland Pipeline LLC

FACILITY DESCRIPTION Modification of existing 420,000 gallon fixed roof petroleum vapor relief tank into an internal floating roof tank.

CITY/TWP Lima

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	1.23