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**
**MERCER COUNTY**
**Application No: 03-13243**

**CERTIFIED MAIL**

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

**DATE: 1/26/00**

BP Amoco Corp-Rockford Bulk Plant
Frank Marsek
200 Public Square 7-T
Cleveland, OH 441142375

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 03-13243

| | |
|---|---|
| Application Number: | 03-13243 |
| APS Premise Number: | 0354000041 |
| Permit Fee: | **$1650** |
| Name of Facility: | BP Amoco Corp-Rockford Bulk Plant |
| Person to Contact: | Frank Marsek |
| Address: | 200 Public Square 7-T<br>Cleveland, OH 441142375 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**South & Clay**
**Rockford**, **Ohio**

Description of proposed emissions unit(s):
**Five fixed roof gasoline/distillate fuel storage tanks and one loading rack.**

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 | 5.98 |

## 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 |
|---|---|---|
| 16,000 gallon gasoline/distillate fuel fixed roof storage tank (Tank# 003) | OAC rule 3745-31-05 | Use of submerged fill<br><br>1.84 tons organic compounds (OC)/yr |
| | OAC rule 3745-21-09(L) | Exempt (see A.2.a) |
| | 40 CFR Part 60, Subpart Kb | None (see A.2.b) |

**2. Additional Terms and Conditions**

**2.a** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**2.b** This emissions unit is located at a bulk gasoline plant with a daily throughput less than 19,998.7 gallons per day , as restricted for the loading rack at the facility, therefore 40 CFR Part 60, Subpart Kb is not applicable.

### B. Operational Restrictions

1. The permittee shall not exceed an annual throughput of 300,000 gallons per year.

2. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-


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level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Gasoline

TLV (ug/m3): 890,000

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 474.8

MAGLC (ug/m3): 21,190

3. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process <u>may</u> be determined to be a "modification":

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

   b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

   d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

   a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

   b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

   c. <u>prior to the change,</u> the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a


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"modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

## D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitation, as well as the corrective actions taken to achieve compliance. These reports shall be submitted by January 31 of each year.

## 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:

   **Emission Limitation**: 1.84 tons OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 300,000 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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 |
|---|---|---|
| 16,000 gallon gasoline/distillate fuel fixed roof storage tank (Tank# 004) | OAC rule 3745-31-05 | Use of submerged fill<br><br>1.84 tons organic compounds (OC)/yr |
| | OAC rule 3745-21-09(L) | Exempt (see A.2.a) |
| | 40 CFR Part 60, Subpart Kb | None (see A.2.b) |

**2. Additional Terms and Conditions**

**2.a** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**2.b** This emissions unit is located at a bulk gasoline plant with a daily throughput less than 19,998.7 gallons per day , as restricted for the loading rack at the facility, therefore 40 CFR Part 60, Subpart Kb is not applicable.

**B. Operational Restrictions**

1. The permittee shall not exceed an annual throughput of 300,000 gallons per year.

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

1. The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.


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## D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitation, as well as the corrective actions taken to achieve compliance. These reports shall be submitted by January 31 of each year.

## 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:

   **Emission Limitation**: 1.84 tons OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 300,000 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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 |
|---|---|---|
| 16,000 gallon gasoline/distillate fuel fixed roof storage tank (Tank# 005) | OAC rule 3745-31-05 | Use of submerged fill<br>0.005 ton organic compounds (OC)/yr |
| | OAC rule 3745-21-09(L) | Exempt (see A.2.a) |
| | 40 CFR Part 60, Subpart Kb | None (see A.2.b) |

**2. Additional Terms and Conditions**

**2.a** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**2.b** This emissions unit is located at a bulk gasoline plant with a daily throughput less than 19,998.7 gallons per day , as restricted for the loading rack at the facility, therefore 40 CFR Part 60, Subpart Kb is not applicable.

**B. Operational Restrictions**

1. The permittee shall not exceed an annual throughput of 400,000 gallons per year.

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

1. The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.


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## D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitation, as well as the corrective actions taken to achieve compliance. These reports shall be submitted by January 31 of each year.

## 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:

   **Emission Limitation**: 0.005 ton OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 400,000 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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 |
|---|---|---|
| 30,000 gallon gasoline/distillate fuel fixed roof storage tank (Tank# 006) | OAC rule 3745-31-05 | Use of submerged fill<br>0.011 ton organic compounds OC/yr |
| | OAC rule 3745-21-09(L) | Exempt (see A.2.a) |
| | 40 CFR Part 60, Subpart Kb | None (see A.2.b) |

**2. Additional Terms and Conditions**

**2.a** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**2.b** This emissions unit is located at a bulk gasoline plant with a daily throughput less than 19,998.7 gallons per day , as restricted for the loading rack at the facility, therefore 40 CFR Part 60, Subpart Kb is not applicable.

**B. Operational Restrictions**

1. The permittee shall not exceed an annual throughput of 900,000 gallons per year.

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

1. The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitation, as well as the corrective actions taken to achieve compliance. These reports shall be submitted by January 31 of each year.


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## 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:

   **Emission Limitation**: 0.011 ton OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 900,000 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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 |
|---|---|---|
| 16,000 gallon gasoline/distillate fuel fixed roof storage tank (Tank # 007) | OAC rule 3745-31-05 | Use of submerged fill |
| | | 0.004 ton organic compounds OC/yr |
| | OAC rule 3745-21-09(L) | Exempt (see A.2.a) |
| | 40 CFR Part 60, Subpart Kb | None (see A.2.b) |

**2. Additional Terms and Conditions**

**2.a** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**2.b** This emissions unit is located at a bulk gasoline plant with a daily throughput less than 19,998.7 gallons per day , as restricted for the loading rack at the facility, therefore 40 CFR Part 60, Subpart Kb is not applicable.

**B. Operational Restrictions**

1. The permittee shall not exceed an annual throughput of 300,000 gallons per year.

2. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:


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Pollutant: Gasoline

TLV (ug/m3): 890,000

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 474.8

MAGLC (ug/m3): 21,190

3. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process <u>may</u> be determined to be a "modification":

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

   b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

   d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

   a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

   b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

   c. <u>prior to the change,</u> the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

   For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.


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## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

## D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitation, as well as the corrective actions taken to achieve compliance. These reports shall be submitted by January 31 of each year.

## 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:

   **Emission Limitation**: 0.004 ton OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 300,000 gallons of gasoline. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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 |
|---|---|---|
| Bulk gasoline plant loading rack | OAC rule 3745-31-05 | 2.28 tons organic compounds (OC)/yr |
| | | Use of vapor balance system |
| | OAC rule 3745-21-09(P) | See A.2 |

**2. Additional Terms and Conditions**

**2.a** For any transfer of gasoline from a loading rack located at the bulk gasoline plant to a delivery vessel, the vapors displaced from the delivery vessel shall be processed by a vapor balance system which is equipped with a vapor tight vapor line from the delivery vessel to the stationary storage tank being unloaded and a means to ensure that the vapor line is connected before gasoline can be transferred and which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the stationary storage tank.

**2.b** Any loading rack at the bulk gasoline plant which transfers gasoline to a delivery vessel shall be equipped for top submerged filling or bottom filling for the transfer of gasoline.

**2.c** All gasoline loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

**B. Operational Restrictions**

1. The daily throughput shall not be equal to or greater than 19,998.7 gallons of gasoline.

2. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.

3. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.


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4. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

5. There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

6. The pressure relief valves on the stationary storage tanks and delivery vessels shall be set to release at no less than 0.7 pound per square inch gauge or the highest possible pressure (in accordance with State or local fire codes, or the "National Fire Prevention Association" guidelines).

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

8. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system, which is employed to meet the requirements of paragraph (P)(1) of OAC rule 3745-21-09, when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

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

1. The permittee shall maintain records of the following information:

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

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

      i. Date of inspection.

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

      iii. Leak determination method.

      iv. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).

      v. Inspector's name and signature.

2. In conjunction with the recordkeeping requirements of section C.1.a, the permittee shall collect and record the annual throughput in gallons (total gallons, to date, from January to December) for the loading rack.


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## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any exceedance of the daily througput limit of 19,998.7 gallons. Each report shall be submitted within 30 days after the deviation occurs.

2. Any leaks in vapor or liquid lines that are not repaired within 15 days after identification shall be reported to the Ohio EPA Northwest District office within 30 days after the repair is completed.

## 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:

   **Emission Limitation**: 2.28 tons OC/yr

   **Applicable Compliance Method**: The emission limitation was established in accordance with EPA, AP-42 equation for loading rack emissions (chapter 5.2.2.1.1, 1-95) using an annual throughput of 2,875,000 gallons per year. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section C.1.

## F. Miscellaneous Requirements

None.


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