x□ **Synthetic Minor Determination and/or** □ **Netting Determination**
Permit To Install **04-01427**

A. Source Description

Citgo Petroleum Corporation operates a petroleum terminal at 1840 Otter Creek Rd. in Oregon, Ohio. This facility is comprised of existing storage tanks and loading racks for gasoline and distillate products.

B. Facility Emissions and Attainment Status

Facility-wide emissions will be restricted by throughput limitations to 95.00 tons per year of VOC and 9.9 tons per year of individual HAP and 24.5 tons per year of all HAPs combined. The attainment status in the area where this facility is located is:

SO2:	Attainment
CO:	Unclassifiable/Attainment
Lead:	Not Designated
NO_x:	Unclassifiable/Attainment6
Ozone:	8-hr non-attainment
PM-10:	Unclassifiable

C. Source Emissions

emissions unit	organic liquid	annual throughput limitation (gallons)	emissions of VOC (tons per year)	combined emissions of HAPs (tons per year)
loading rack	distillate	630,700,000	0.44	0.02
	ethanol	60,000,000	1.23	-
	gasoline	109,900,000	27.03	0.71
storage tanks	distillate	1,177,344,000	9.06	0.48
	ethanol	60,000,000	0.02	0.02
	gasoline	1,177,344,000	55.35	1.43
deminimis sources	all	proportional to maximum throughput	0.01	0.00
total			95.00	2.66

Note: two loading arms have been added to the loading rack, however since restrictions have been added to existing sources, no increases in allowable emissions have occurred.

D. Conclusion

At the emissions levels made enforceable by this permit, the Citgo facility will not be subject to Title V or MACT permitting requirements.

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: DRAFT PERMIT TO INSTALL
LUCAS COUNTY
Application No: 04-01427
Fac ID: 0448010220

CERTIFIED MAIL

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

DATE: 12/6/2005

CITGO Petroleum Corp - Toledo Terminal
Carl Venke
6433 Cosgray Rd
Dublin, OH 43016

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2175** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **TDES** **Toledo Metro. Area Council of Gov.** **IN** **MI**

LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01427** FOR AN AIR CONTAMINANT SOURCE FOR
CITGO Petroleum Corp - Toledo Terminal

On 12/6/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **CITGO Petroleum Corp - Toledo Terminal**, located at **1840 Otter Creek Road, Oregon**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01427:

Modifications to PTI 04-696 (T036), PTI 04-1112 (T020), PTI 04-01259 (J001 and T014) and 04-1379 (T018) to create synthetic minors, emiminating applicability of Title V.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]

DRAFT PERMIT TO INSTALL 04-01427

Application Number: 04-01427

Facility ID: 0448010220

Permit Fee: **To be entered upon final issuance**

Name of Facility: CITGO Petroleum Corp - Toledo Terminal

Person to Contact: Carl Venke

Address: 6433 Cosgray Rd
Dublin, OH 43016

Location of proposed air contaminant source(s) [emissions unit(s)]:
1840 Otter Creek Road
Oregon, Ohio

Description of proposed emissions unit(s):
Modifications to PTI 04-696 (T036), PTI 04-1112 (T020), PTI 04-01259 (J001 and T014) and 04-1379 (T018) to create synthetic minors, emiminating applicability of Title V.

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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	permit total 48.73 facility-wide 95.00
HAPs	individual 9.9 combined 24.5

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
J001 - loading rack comprised of 4 bays with 14 loading arms handling up to 3000 gpm of gasoline, 1200 gpm of ethanol and 1200 gpm of distillate, all controlled by a vapor balance system with a regenerative carbon adsorber - modification	OAC rule 3745-31-05(A)(3)	Stack emissions of volatile organic compounds (VOC) shall not exceed 54.35 pounds per hour and 17.01 tons per year from the carbon adsorber, and see section A.2.a and A.2.b. Fugitive emissions of VOC shall not exceed 11.69 tons per year from truck loading.
	OAC rule 3745-31-05(C)	See sections A.2.c and A.2.d.
	OAC rule 3745-21-09(Q)	See section A.2.e.
	40 CFR Part 60, Subpart XX	See section A.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Q) and 40 CFR Part 60 Subpart XX

2.b The permittee shall control the emissions from loading of all fuels with a regenerative carbon adsorber.

2.c The emissions of VOC from all emissions units at this facility shall be restricted to 95 tons per year as a rolling 12-month summation.

2.d The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall be restricted to 9.9 tons per year for any individual HAP, and 24.5 tons per year for any combination of HAPs, as a rolling 12-month summations.

2.e i. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel: all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and the pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.

ii. The loading rack shall be equipped with a vapor control system whereby: all vapors collected by the vapor collection system are vented to the vapor control system; and any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.

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

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

2.f The emissions to the atmosphere from the vapor collection system due to loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds (TOC) per liter of gasoline loaded (0.292 pound of TOC per 1000 gallons).

B. Operational Restrictions

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

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

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

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

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

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

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

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

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

iii. If either the quarterly or semiannual cross-check provided in paragraphs 4.c.i through 4.c.ii of this section reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.

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

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

f. Alternate procedures to those described in paragraphs 4.a through 4.e of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator of USEPA.

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

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

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

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

9. The following carbon adsorption/gasoline absorption vapor recovery unit (VRU) parameters have been identified as key operating parameters for which acceptable operating ranges have been established. The permittee shall operate the VRU within these acceptable operating ranges:

   a. to ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 25 inches of Hg. This vacuum level shall be maintained while the air purge solenoid is open, during the carbon polishing phase (final minutes) of the regeneration;

   b. to ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F;

   c. to ensure proper flow of gasoline to the adsorber nozzle and the seal cooler when the vapor recovery unit is operating, a differential pressure of 49 inches of water column (1.77 psi) shall be maintained across the orifice plate, located in the gasoline supply; and,

   d. to ensure proper adsorption, the carbon bed temperature, at all levels, shall not exceed 150 degrees F.

   Operation of the VRU outside of these specified operating ranges is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

10. a. The annual distillate throughput for this emissions unit shall not exceed 630,700,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

    b. The annual ethanol throughput for this emissions unit shall not exceed 60,000,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

    c. The annual gasoline throughput for this emissions unit shall not exceed 109,900,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

    d. The annual distillate throughput of all storage tanks on an as received basis shall not exceed 1,177,344,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

    e. The annual gasoline throughput of all storage tanks on an as received basis shall not exceed 1,177,344,000 gallons based upon a rolling, 12-month summation of the monthly throughputs.

The permittee shall comply with the rolling 12-month throughput limitation immediately upon startup under this permit based on past throughput records.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure in the vapor collection system, while the emissions unit is in operation, to demonstrate compliance with the pressure range established in section A.2.e.i. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

2. The permittee shall properly install, operate, and maintain equipment to monitor the gasoline supply temperature, the absorber pressure, the carbon bed temperature (at all levels), and the carbon bed vacuum while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

3. The permittee shall collect and record the following information once each day (Monday through Friday, excluding holidays):

   a. the temperature of the carbon bed after any regeneration cycle, including any cooling cycle(s);

   b. the temperature of the carbon bed, at all levels;

   c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

   d. the maximum carbon bed vacuum in inches of mercury during regeneration of the recorded bed;

   e. the gasoline supply temperature, in degrees F;

   f. the differential pressure across the orifice plate in the gasoline supply line in psi; and

   g. the pressure in the vapor collection system, in inches of water column.

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

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

6. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results, as determined by Method 27 of 40 CFR Part 60, Appendix A. This documentation shall include, as a minimum, the following information:

   a. test title (Gasoline Delivery Tank Pressure Test - EPA Reference Method 27);
   b. tank owner and address;
   c. tank identification number;
   d. testing location;
   e. date of test;
   f. tester name and signature;
   g. name, signature, and affiliation of witnessing inspector, if any; and
   h. test results, including the actual pressure change in 5 minutes, in mm of water column (average for 2 runs).

7. A record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

   a. date of inspection;
   b. findings (may include no leak(s) discovered, or the location, nature and severity of leak(s));
   c. leak determination method;
   d. corrective action taken, including the date each leak was repaired and the reason for any repair interval in excess of 15 days; and
   e. inspector name and signature.

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

   a. the total, individual throughput of emissions unit J001 (loadout) of distillates, ethanol and gasoline (including transmix), in gallons;

   b. the rolling, 12-month summations of the total, individual loadout of distillates, ethanol and gasoline, in gallons;

   c. the total, individual throughput of all storage tanks on an as received basis (receipt) at the facility of distillates and gasoline (including transmix), in gallons;

   d. the rolling, 12-month summations of the total, individual receipt at the facility of distillates and gasoline; in gallons; and

   e. the calculated, total HAP (individual and combined HAPs) and VOC emissions and the rolling, 12-month summations of HAP (individual and combined HAPs)

and VOC emissions from distillates, ethanol, gasoline and all other materials for all emissions units at the facility, in tons.

9. All records required under section C. of this permit shall be maintained in accordance with the Records Retention Requirements of Part I - General Terms and Conditions.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure deviation (excursion) reports that identify all periods of time during which the pressure in the vapor collection system did not comply with the allowable range of minus 6 to plus 18 inches of water gauge pressure.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any parameter readings that are outside of the acceptable value or range for each vapor collection system and VRU key operating parameter.

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month throughput limitations for this emissions unit.

5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month throughput limitations for the throughput of all storage tanks.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC and HAP limitations.

7. If no deviations occurred in the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the preceding 3-month period.

E. Testing Requirements

1. Compliance with the emission limitation in section A.1 of these terms and conditions shall be determined in accordance with the following method:

   a. Emission Limitation:

      35 mg of total organic compounds per liter of gasoline loaded

      Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503. The most recent test was performed on May 29, 2002 and resulted in an emission rate of 1.48 mg of total organic compounds per liter of gasoline loaded.

b. Emission Limitation:

54.35 pounds per hour VOC from carbon adsorber exhaust

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

(35 mg/l x 3.785 l/gal x lb/454 g x g/1000 mg x 180,000 gal of gasoline/hr)
+ [(1.29 lb/1000 gal x 72,000 gal of ethanol/hr)
+ (0.045 lb/1000 gal x 72,000 gal of distillate/hr)][1-0.981][0.987]

where:

98.7% is the capture efficiency and 98.1% is the control efficiency by weight

35 mg/l is demonstrated through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503.

180,000 gal/hr gasoline and 72,000 gal/hr ethanol and distillate are maximum loading rates.

1.29 lb/1000 gal and 0.045 lb/1000 gal distillate are emisisons factors derived by calculations using AP-42 Section 5.2, Equation (1) dated 1/95:

$$L = 12.46\ SPM/T$$

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded
S = a saturation factor (1)
P = true vapor pressure, psia (ethanol = 1.218, distillate = 0.015)
M = molecular weight. lb/lb mole (ethanol = 46.07, distillate = 130)
T = temperature of bulk liquid, degrees R (540)

If required, the permittee shall demonstrate compliance through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503 and OAC rule 3745-21-10(E).

c. Emission Limitation:

17.01 tons per year VOC from carbon adsorber exhaust

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

{(35 mg/l x 3.785 l/gal x lb/454 g x g/1000 mg x 109,900,000 gal of gasoline/yr)
+ [(1.29 lb/1000 gal x 60,000,000 gal of ethanol/yr)
+ (0.045 lb/1000 gal x 630,700,000 gal of distillate/yr)][1-0.981][0.987]} ÷ 2000 lb/ton

where:

98.7% is the capture efficiency and 98.1% is the control efficiency by weight

35 mg/l is demonstrated through emissions testing performed in accordance with the procedures and method(s) detailed in 40 CFR 60.503.

109,900,000 gal/yr gasoline, 60,000,000 gal/yr ethanol and 630,700,000 gal/yr distillate are enforceable limits.

1.29 lb/1000 gal and 0.064 lb/1000 gal distillate are emisisons factors derived by calculations using AP-42 Section 5.2, Equation (1) dated 1/95:

L = 12.46 SPM/T

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded
S = a saturation factor (1)
P = true vapor pressure, psia (ethanol = 1.218, distillate = 0.015)
M = molecular weight. lb/lb mole (ethanol = 46.07, distillate = 130)
T = temperature of bulk liquid, degrees R (540)

d. Emission Limitation:

11.69 tons per year fugitive VOC

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, as follows:

[(15.47 lb/1000 gal x 109,900,000 gal of gasoline/yr)
+ (1.29 lb/1000 gal x 60,000,000 gal of ethanol/yr)
+ (0.045 lb/1000 gal x 630,700,000 gal of distillate/yr)][1-0.987]÷2000 lb/ton

where:

98.7% is the capture efficiency

109,900,000 gal/yr gasoline, 60,000,000 gal/yr ethanol and 630,700,000 gal/yr distillate are enforceable limits.

15.47 lb/1000 gal gasoline, 1.29 lb/1000 gal ethanol and 0.045 lb/1000 gal distillate are emissions factors derived by calculations using AP-42 Section 5.2, Equation (1) dated 1/95:

$$L = 12.46\ SPM/T$$

for L = loading loss, pounds of OC per 1000 gallons of liquid loaded
S = a saturation factor (1)
P = true vapor pressure, psia (RVP15= 11.59, ethanol = 1.218, distillate = 0.015)
M = molecular weight, lb/lb mole (RVP15 = 57.84, ethanol = 46.07, distillate = 130)
T = temperature of bulk liquid, degrees R (540)

e. Emission Limitation:

95.00 tons per year VOC from all emissions units at this facility

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by calculating the sum of emissions determined by paragraphs i thru v below:

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

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

iii. VOC emissions from gasoline truck loading shall be determined using AP-42 section 5.2 dated January 1995, the most recent VOC stack test results for the control efficiency, and a collection efficiency of 98.7 percent (AP-42, Notice of Proposed Change to AP-42 Section 5.2, dated December 15, 1995).

iv. VOC emissions from distillate loading shall be determined using AP-42 Section 5.2, dated January, 1995.

v. VOC emissions from ethanol loading shall be determined using AP-42 Section 5.2, dated January, 1995

f. Emission Limitation:

The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year of any individual HAP, and 24.5 tons per year for any combination of HAPs, as a rolling 12-month summations.

Applicable Compliance Method:

To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual monthly VOC emission rate (in tons per month) for all VOC emissions from the facility, including fugitive emissions. For each monthly individual HAP emission rate calculated, add the monthly total to the total for the previous 11 months to determine the rolling 12-month summation of individual HAP emissions. To determine the 12-month rolling summation of any combination of HAPs, calculate the sum of the rolling 12-month summation of all individual HAP emissions.

The HAP emissions from truck loading and storage shall be determined using the following emission factors:

HAP Emissions (lb/lb VOC) from Gasoline (From Tanks 4.0 speciation)

isopropyl benzene	2.98E-04
1,2,4 trimethyl benzene	1.37E-03
hexane	3.79E-03
benzene	4.48E-03
isooctane	5.60E-03
tolulene	7.43E-03
ethylbenzene	9.68E-04
xylene	4.64E-03
cyclohexane	6.16E-04

HAP emissions (lb/lb VOC) from Distillate (From Tanks 4.0 speciation)

1,2,4 trimethyl benzene	1.72E-02
hexane	1.86E-04
benzene	8.89E-04

tolulene	9.74E-03
ethylbenzene	1.25E-03
xylene	2.32E-02

g. Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable in a written agreement to the Ohio EPA, the Toledo Division of Environmental Services and CITGO Petroleum Corporation.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): the procedures and method(s) detailed in 40 CFR 60.503. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where

warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 04-01259 as modified on January 21, 2003.

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
T014 - internal floating roof tank, 67,542 bbl, tank 210 - modification	OAC rule 3745-31-05(A)(3)	The emissions of VOC from this emissions unit shall not exceed 9.11 tons per year, and see sections A.2.a and A.2.b.
	OAC rule 3745-21-09(L)	See section A.2.c.
	40 CFR 60 Subpart Kb	See section A.2.d.

2. Additional Terms and Conditions

2.a The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR 60 Subpart Kb.

2.b The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at the restricted throughput level for the entire facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The permittee shall install and maintain a fixed roof in combination with an internal floating roof for this emissions unit.

2.d The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. 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,

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emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. 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.

vi. 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.

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vii. 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.

viii. 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.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

B. Operational Restrictions

1. The annual gasoline throughput of all storage tanks on an as received basis shall not exceed 1,177,344,000 gallons as a rolling, 12-month summation of the daily throughputs.

2. The permittee shall comply with the rolling 12-month throughput limitation immediately upon startup under this permit based on past gasoline throughput.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform the following monitoring and record keeping:

   a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

   b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 40 CFR 60.115b(a)(3). 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 vessel will be emptied as soon as possible.

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c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(2)(ii)(B), the permittee shall:

i. Visually inspect the vessel as specified in paragraph d below, at least every 5 years; or
ii. Visually inspect the vessel as specified in paragraph b above.

d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.1.b. and Section C.1.c.ii of this permit and at intervals no greater than 5 years in the case of vessels specified in Section C.1.c.i. above.

2. The permittee shall:

a. Keep a record of each inspection performed as required by C.1.a, 1.b and 1.c above. 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).

3. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the source.

4. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

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

a. The throughput of all gasoline storage tanks on an as received basis for each month.

b. The rolling, 12-month summation of the throughput of all gasoline storage tanks on an as received basis.

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D. Reporting Requirements

1. The permittee shall meet the following requirements:

   a. Furnish the Toledo Division of Environmental Services with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).

   b. If any of the conditions described in 40 CFR 60.113b(a)(2), as described in paragraph C.1.b. above, are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

   c. After each inspection required by 40 CFR 60.113b(a)(3), as described in paragraph C.1.d. above, that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), as described in paragraph C.1.b. above, a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1)), as described in paragraph A.2.d. above, or 40 CFR 60.113b(a)(3)), as described in paragraph C.1.c. above, and list each repair made.

2. Notify the Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs C.1.a and C.1.c to afford the Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by paragraph C.1.c is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. 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 Toledo Division of Environmental Services at least 7 days prior to the refilling.

3. The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services that identify all exceedances of the rolling, 12-month gasoline throughput limitation. If no deviations occurred in the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the preceding 3-month period.

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E. Testing Requirements

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

   Emission Limitation

   9.11 tons per year VOC

   Applicable Compliance Method

   This emission limitation was developed by using the most recent version of EPA's Tanks computer software at the restricted gasoline throughput level for the entire facility. Therefore, if compliance is shown with the restricted throughput level for the entire facility, compliance shall also be shown with the annual emission limitation for this emissions unit.

F. Miscellaneous Requirements

1. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

   a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

   b. The vapor pressure may be obtained by the following:

      i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

      ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

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c. For other liquids, the vapor pressure:

i. May be obtained from standard reference texts; or

ii. Determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see 40 CFR 60.17); or

iii. Measured by an appropriate method approved by the Administrator; or

iv. Calculated by an appropriate method approved by the Administrator.

2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 04-01259 as modified on January 21, 2003.

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T019 - internal floating roof tank, 27,424 bbl, tank 218 - modification	OAC rule 3745-31-05(A)(3)	The emissions of VOC from this emissions unit shall not exceed 6.39 tons per year, and see sections A.2.a and A.2.b.
	OAC rule 3745-21-09(L)	See section A.2.c.
	40 CRF Part 60, Subpart Kb	See section A.2.d

2. Additional Terms and Conditions

2.a The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR 60 Subpart Kb.

2.b The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at the restricted throughput level for the entire facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The permittee shall install and maintain a fixed roof in combination with an internal floating roof for this emissions unit. Compliance with the requirements of 40 CFR Part 60, Subpart Kb will be adequate to demonstrate compliance with this applicable rule.

2.d The permittee shall install and maintain a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the

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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.

ii. The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. 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.

vi. 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

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vii. 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.

viii. 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.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

B. Operational Restrictions

1. The annual gasoline throughput of all storage tanks on an as received basis shall not exceed 1,177,344,000 gallons as a rolling, 12-month summation of the daily throughputs.

2. The permittee shall comply with the rolling 12-month throughput limitation immediately upon startup under this permit based on past gasoline throughput.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform the following monitoring and record keeping:

   a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

   b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 40 CFR 60.115b(a)(3). 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 vessel will be emptied as soon as possible.

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c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(2)(ii)(B), the permittee shall:

i. Visually inspect the vessel as specified in paragraph d below, at least every 5 years; or
ii. Visually inspect the vessel as specified in paragraph b above.

d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.1.b. and Section C.1.c.ii of this permit and at intervals no greater than 5 years in the case of vessels specified in Section C.1.c.i. above.

2. The permittee shall keep a record of each inspection performed. 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).

3. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the source.

4. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

5. The permittee shall maintain records on rolling 12-month basis of the throughput of product in gallons. This throughput may be measured as the actual throughput of this emissions unit or as the combined rolling 12-month throughput of gasoline, ethanol, fuel additives and other organic liquids with a true vapor pressure greater than 11.11 psia loaded through all loading racks at this facility.

D. Reporting Requirements

1. The permittee shall meet the following requirements:

a. Furnish the Toledo Division of Environmental Services with a report that describes the control equipment and certifies that the control equipment meets

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the specifications of 40 CFR 60.112b(a) and 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).

b. If any of the conditions described in 40 CFR 60.113b(a)(2), as described in paragraph C.1.b. above, are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

c. After each inspection required by 40 CFR 60.113b(a)(3), as described in paragraph C.1.d. above, that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), as described in paragraph C.1.b. above, a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1)), as described in paragraph A.2.d. above, or 40 CFR 60.113b(a)(3)), as described in paragraph C.1.c. above, and list each repair made.

2. Notify the Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs C.1.a and C.1.c to afford the Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by paragraph C.1.c is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. 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 Toledo Division of Environmental Services at least 7 days prior to the refilling.

3. The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services that identify all exceedances of the rolling, 12-month gasoline throughput limitation. If no deviations occurred in the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the preceding 3-month period.

E. Testing Requirements

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

<u>Emissions Limitations</u>:

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Volatile organic compound (VOC) emissions shall not exceed 6.39 tons per year.

Applicable Compliance Method:

Compliance shall be determined by estimating emissions using the most recent version of EPA's Tanks computer software or the most recent emission factors contained in AP-42 Chapter 7, using the actual annual throughput and annual average vapor pressure.

F. Miscellaneous Requirements

1. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

   a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

   b. The vapor pressure may be obtained by the following:

      i. available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

      ii. the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

   c. For other liquids, the vapor pressure:

      i. may be obtained from standard reference texts; or

      ii. determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see 40 CFR 60.17); or

      iii. measured by an appropriate method approved by the Administrator; or

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iv. calculated by an appropriate method approved by the Administrator.

2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 04-01371 as modified on July 15, 2004.

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T020 - internal floating roof tank, 23,378 bbl, tank 219 - modification	OAC rule 3745-31-05(A)(3)	The emissions of VOC from this emissions unit shall not exceed 4.52 tons per year, and see sections A.2.a and A.2.b.
	OAC rule 3745-21-09(L)	See section A.2.c.
	40 CFR 60 Subpart Kb	See section A.2.d.

2. Additional Terms and Conditions

2.a The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(L) and 40 CFR 60 Subpart Kb.

2.b The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at the restricted throughput level for the entire facility. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

2.c The permittee shall install and maintain a fixed roof in combination with an internal floating roof for this emissions unit. Compliance with the requirements of 40 CFR Part 60, Subpart Kb will be adequate to demonstrate compliance with this applicable rule.

2.d The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface

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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.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v. 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.

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vi. 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.

vii. 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.

viii. 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.

ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

B. Operational Restrictions

1. The annual gasoline throughput of all storage tanks on an as received basis shall not exceed 1,177,344,000 gallons based upon a rolling, 12-month summation of the daily throughputs.

2. The permittee shall comply with the rolling 12-month throughput limitation immediately upon startup under this permit based on past gasoline throughput.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall:

a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Toledo Division of Environmental Services in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must

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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 vessel will be emptied as soon as possible.

c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(2)(ii)(B), the permittee shall:

i. Visually inspect the vessel as specified in paragraph d below, at least every 5 years; or
ii. Visually inspect the vessel as specified in paragraph b above.

d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.1.b. and Section C.1.c.ii of this permit and at intervals no greater than 5 years in the case of vessels specified in Section C.1.c.i. above.

2. The permittee shall keep a record of each inspection performed as required by C.1.a, 1.b and 1.c above. 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).

3. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the source.

4. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

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

a. The throughput of all gasoline storage tanks on an as received basis for each month.

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b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the throughput of all gasoline storage tanks on an as received basis.

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D. Reporting Requirements

1. The permittee shall meet the following requirements:

   a. Furnish the Toledo Division of Environmental Services with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a) and 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).

   b. If any of the conditions described in 40 CFR 60.113b(a)(2), as described in paragraph C.1.b. above, are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

   c. After each inspection required by 40 CFR 60.113b(a)(3), as described in paragraph C.1.d. above, that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), as described in paragraph C.1.b. above, a report shall be furnished to the Toledo Division of Environmental Services within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1)), as described in paragraph A.2.d. above, or 40 CFR 60.113b(a)(3)), as described in paragraph C.1.c. above, and list each repair made.

2. Notify the Toledo Division of Environmental Services in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs C.1.a and C.1.c to afford the Toledo Division of Environmental Services the opportunity to have an observer present. If the inspection required by paragraph C.1.c is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Toledo Division of Environmental Services at least 7 days prior to the refilling of the storage vessel. 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 Toledo Division of Environmental Services at least 7 days prior to the refilling.

3. The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services that identify all exceedances of the rolling, 12-month gasoline throughput limitation. If no deviations occurred in the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the preceding 3-month period.

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E. Testing Requirements

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

   Emission Limitation

   4.52 tons per year VOC

   Applicable Compliance Method

   This emission limitation was developed by using the most recent version of EPA's Tanks computer software at the restricted gasoline throughput level for the entire facility. Therefore, if compliance is shown with the restricted throughput level for the entire facility, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

1. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

   a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

   b. The vapor pressure may be obtained by the following:

      i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

      ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

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c. For other liquids, the vapor pressure:

i. May be obtained from standard reference texts; or

ii. Determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see 40 CFR 60.17); or

iii. Measured by an appropriate method approved by the Administrator; or

iv. Calculated by an appropriate method approved by the Administrator.

2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 04-01112 as modified on February 18, 1998.

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T036 - fixed roof tank, 7602 gallons, Tank 100 - modification	OAC rule 3745-31-05(A)(3)	The emissions of VOC from this emissions unit shall not exceed 0.005 ton per year, and see section A.2.a.
	OAC rule 3745-21-09(L)	Exempt, capacity <40,000 gallons.

2. Additional Terms and Conditions

2.a The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at the restricted gasoline throughput level for the entire facility and an addition rate of 38cc per 40 gallons of gasoline. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

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

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Emission Limitation

0.005 ton per year VOC

Applicable Compliance Method

This emission limitation was developed by using the most recent version of EPA's Tanks computer software at the restricted gasoline throughput level for the entire facility. Therefore, if compliance is shown with the restricted throughput level for the entire facility, and the rate of additive addition is not increased, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 04-696 as issued on July 17, 1991.

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