



Mike DeWine, Governor
 Jon Husted, Lt. Governor
 Anne M. Vogel, Director

09/28/2023

Certified Mail

Mike McKenna
 Freepoint Eco-Systems Hebron
 3050 Post Oak Blvd
 Suite 1330
 Houston, TX 77056

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| Yes | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MODELING SUBMITTED |
| No | SYNTHETIC MINOR TO AVOID TITLE V |
| No | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0145000580
 Permit Number: P0134338
 Permit Type: Initial Installation
 County: Licking

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter, you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Robert Sprague," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 30 East Broad Street, 4th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org.

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Ohio EPA document search website here: <https://epa.ohio.gov/help-center/edocument-search/edocument-search>.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Freepoint Eco-Systems Hebron**

| | |
|----------------|----------------------|
| Facility ID: | 0145000580 |
| Permit Number: | P0134338 |
| Permit Type: | Initial Installation |
| Issued: | 09/28/2023 |
| Effective: | 09/28/2023 |
| Expiration: | 07/13/2032 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
Freepoint Eco-Systems Hebron

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Final Permit-to-Install and Operate
Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

Authorization

Facility ID: 0145000580
Application Number(s): A0074600
Permit Number: P0134338
Permit Description: Installation PTIO for two product storage tanks at a plastic conversion facility.
Permit Type: Initial Installation
Permit Fee: \$800.00
Issue Date: 09/28/2023
Effective Date: 09/28/2023
Expiration Date: 07/13/2032
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Freepoint Eco-Systems Hebron
522 Milliken Dr
Hebron, OH 43025

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town St., 5th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in cursive script that reads "Anne M. Vogel".

Anne M. Vogel
Director

Entered into the Journal of the Director on:

Date: 09/28/2023



Final Permit-to-Install and Operate
 Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

Authorization (continued)

Permit Number: P0134338
 Permit Description: Installation PTIO for two product storage tanks at a plastic conversion facility.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Storage Tanks

| | |
|-----------------------------------|-------------------------------|
| Emissions Unit ID: | T002 |
| Company Equipment ID: | Pyrolysis Oil Storage Tank #2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T003 |
| Company Equipment ID: | Pyrolysis Oil Storage Tank #3 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

List of Commonly Used Abbreviations

| | | |
|---|--|---|
| AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors | IBR = Incorporation by Reference | PER = Permit Evaluation Report |
| ASTM = American Society for Testing and Materials | ID = Identification Number (typically referring to a facility ten-digit ID number) | PM = particulate matter |
| BACT = Best Available Control Technology | LAER = Lowest Achievable Emission Rate | PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns |
| BAT = Best Available Technology | lb(s)/hr = pound(s) per hour | PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns |
| CAA = Clean Air Act (1955, 70, 77, 80) | LDAR = Leak Detection and Repair | ppb = parts per billion |
| CAAA = Clean Air Act Amendments (1990) | LPG = liquefied petroleum gas/propane | ppm = parts per million |
| CAM = Compliance Assurance Monitoring | MACT = Maximum Achievable Control Technology | PSD = Prevention of Significant Deterioration |
| CEM = Continuous Emissions Monitor | MAGLC = Maximum Acceptable Ground Level Concentration | psi = pounds per square inch |
| CEMS = Continuous Emissions Monitoring System | mg/m ³ = milligrams per cubic meter | psia = pounds per square inch absolute |
| CFC = chlorofluorocarbon | MM = million | PTE = Potential-to-Emit |
| CFR = Code of Federal Regulations | MMBtu = million British Thermal Units | PTI = Permit-to-Install |
| CH ₄ = methane | MON = Miscellaneous Organic Chemical Manufacturing NESHAP | PTIO = Permit-to-Install and Operate |
| CI = compression ignition | MSDS = Material Safety Data Sheet | PTO = Permit-to-Operate |
| CO = carbon monoxide | MSW = Municipal Solid Waste | PWR = process weight rate |
| CO ₂ = carbon dioxide | NAAQS = National Ambient Air Quality Standard | RACM = Reasonably Available Control Measures |
| COM = Continuous Opacity Monitor | NESHAP = National Emission Standard for Hazardous Air Pollutants | RACT = Reasonably Available Control Technology |
| DAPC = Division of Air Pollution Control | NG = natural gas | RATA = Relative Accuracy Test Audit |
| DO/LAA = District Office/Local Air Agency | ng/m ³ = nanograms per cubic meter | RTO = regenerative thermal oxidizer |
| dscf = dry standard cubic foot | NH ₃ = ammonia | SB265 = Senate Bill 265 |
| EAC = Emissions Activity Category | NMHC = non-methane hydrocarbons | scfm = standard cubic feet per minute |
| eDocs = Electronic Documents Database | NMOC = non-methane organic compound | SI = spark ignition |
| ERAC = Environmental Review Appeals Commission | NNSR = Nonattainment New Source Review | SIP = State Implementation Plan |
| ESP = electrostatic precipitator | NO = nitrogen oxide | SM = Synthetic Minor |
| EU = Emissions Unit | NO ₂ = nitrogen dioxide | SO ₂ = sulfur dioxide |
| FEPTIO = Federally Enforceable Permit-to-Install and Operate | NO _x = nitrogen oxides | SOB = Statement of Basis |
| FER = Fee Emissions Report | NSPS = New Source Performance Standard | SSMP = Startup, Shutdown and Malfunction Plan |
| FR = Federal Register | NSR = New Source Review | T & C = Term and Condition |
| GACT = Generally Achievable Control Technology | NTV = Non-Title V | TDS = total dissolved solids |
| GHG = greenhouse gases | O&M = Operation and Maintenance | TLV = Threshold Limit Value |
| gr = grains | O ₃ = ozone | TO = thermal oxidizer |
| gr/dscf = grains per dry standard cubic foot | OAC = Ohio Administrative Code | TPH = ton(s) per hour |
| H ₂ S = hydrogen sulfide | OC = organic compound | TPY = ton(s) per year |
| H ₂ SO ₄ = sulfuric acid | OEPA = Ohio Environmental Protection Agency | TSP = total suspended particulates |
| HAP = hazardous air pollutant | ORC = Ohio Revised Code | VE = visible emissions |
| HCl = hydrochloride | Pb = lead | VMT = vehicle miles traveled |
| HF = hydrogen fluoride | PBR = Permit-By-Rule | VOC = volatile organic compound |
| Hg = mercury | PCB = polychlorinated biphenyl | WPP = Work Practice Plan |
| HON = Synthetic Organic Chemical Manufacturing NESHAP | PE = particulate emissions | µg/m ³ = micrograms per cubic meter |
| hp = horsepower | PEMS = Predictive Emissions Monitoring System | |
| HVLP = high volume, low pressure | | |



Final Permit-to-Install and Operate
Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio

EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.



Final Permit-to-Install and Operate
Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Freepoint Eco-Systems Hebron

Permit Number: P0134338

Facility ID: 0145000580

Effective Date: 09/28/2023

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Freepoint Eco-Systems Hebron
Permit Number: P0134338
Facility ID: 0145000580
Effective Date: 09/28/2023

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Storage Tanks: T002 and T003

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| T002 | 376,012 gallon pyrolysis oil storage tank with an internal floating roof |
| T003 | 376,012 gallon pyrolysis oil storage tank with an internal floating roof |

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| a. | OAC rule 3745-21-09(L) | See c)(1) below. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii) | The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the PTE is less than 10 tons per year taking into account the requirements established under OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb. |
| c. | 40 CFR Part 60, Subpart Kb [40 CFR 60.110b – 60.117b] [In accordance with 40 CFR 60.110b(a) and 60.112b(a), this emissions unit is a storage vessel with a capacity greater than 75 m ³ (19,815 gallons) that is used to store volatile organic liquids with maximum | See c)(2) below. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| | true vapor pressure greater than 5.2 kPa (0.75 psia) and less than 76.6 kPa (11.1 psia) for which construction, reconstruction or modification commenced after July 23, 1984.] | |
| d. | 40 CFR Part 60, Subpart A [40 CFR 60.1 – 60.19] | See b)(2)a. |

(2) Additional Terms and Conditions

- a. The permittee shall comply with the applicable requirements of the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19) as specified in 40 CFR Part 60, Subpart Kb.

c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and/or covers as follows:
 - a. The fixed roof storage tank shall be equipped with an internal floating roof.
 - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
 - c. The rim vents, if present, shall be set to open or at the manufacturer’s recommended setting when the roof is being floated off the roof leg supports.
 - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Kb, including the following sections:

| | |
|-----------------------------|--|
| 40 CFR 60.112b(a)(1) | Equip each storage vessel with a fixed roof in combination with an internal floating roof. |
| 40 CFR 60.112b(a)(1)(i) | Ensure the internal floating roof is resting or floating on the liquid surface, except as provided in the rule. |
| 40 CFR 60.112b(a)(1)(ii)(B) | Equip the internal floating roof with two seals mounted above the other to form a continuous closure that completely covers the space between the wall of the tank and the edge of the internal floating roof. |
| 40 CFR 60.112b(a)(1)(iii) | Ensure each opening in the noncontact internal floating roof, except for automatic bleeder vents and rim space vents, provides a projection below the liquid service. |

| | |
|----------------------------|--|
| 40 CFR 60.112b(a)(1)(iv) | Ensure 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 equipped with a cover or lid maintained in a closed position except when the device is in actual use. Each cover or lid must be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when in use. |
| 40 CFR 60.112b(a)(1)(v) | Equip automatic bleeder vents with a gasket and ensure the vents are closed at all times except when the roof is being floated off or being landed on the roof leg supports. |
| 40 CFR 60.112b(a)(1)(vi) | Equip rim space vents with a gasket and set the vents to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. |
| 40 CFR 60.112b(a)(1)(vii) | Ensure each penetration of the internal floating roof for the purpose of sampling is a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. |
| 40 CFR 60.112b(a)(1)(viii) | Ensure each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof has a flexible fabric sleeve seal or a gasketed sliding cover. |
| 40 CFR 60.112b(a)(1)(ix) | Ensure each penetration of the internal floating roof that allows for passage of a ladder has a gasketed sliding cover. |

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
 - a. the types of petroleum liquids stored in the tank; and
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

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| 40 CFR 60.113b(a)(1) | Visually inspect the internal floating roof, the primary seal, and the secondary seal prior to filling the storage vessel. |
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| | Repair any holes, tears, or other openings before filling the storage vessel. |
| 40 CFR 60.113b(a)(3) and (a)(2) | Visually inspect the internal floating roof and the primary and secondary seals through manholes and roof hatches once every 12 months after the initial fill. Either empty the tank or take any necessary corrective action within 45 days unless a 30-day extension is requested. |
| 40 CFR 60.113b(a)(4) | Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the storage vessel is emptied and degassed and within 10 year intervals. Make necessary repairs before refilling the storage vessel. |
| 40 CFR 60.115b(a)(2) | Maintain a record of each inspection performed as required by 40 CFR 60.113b(a)(1) – (a)(4) that identifies the storage vessel and includes the inspection date and conditions observed. |
| 40 CFR 60.116b(a) | Maintain copies of all records required by 40 CFR Part 60, Subpart Kb for a period of two years, except that records required by 40 CFR 60.116b(b) must be kept for the life of the storage vessel. |
| 40 CFR 60.116b(b) | Maintain records showing the dimensions of the storage vessel and analysis of the capacity of the storage vessel. |
| 40 CFR 60.116b(c) | Maintain records of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period. |
| 40 CFR 60.116b(e) | Determine the true vapor pressure using available data on storage temperature as determined pursuant to 40 CFR 60.116b(e)(1) - (e)(3). |
| 40 CFR 60.7(b) | Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility and any malfunction of the air pollution control equipment. |

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA, Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the director (the Ohio EPA, Central District Office) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Kb, including the following sections:

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| 40 CFR 60.113b(a)(5) | Notify the Administrator in writing at least 30 days prior to the filling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) or (a)(4), except as provided in the rule. |
| 40 CFR 60.7(a) and 40 CFR 60.115b(a)(1) | Provide an initial notification of the date construction of the affected facility commenced and the actual date of initial startup of the affected facility. Attach a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 60.113b(a)(1). |
| 40 CFR 60.115b(a)(3) | Furnish a report to the Administrator within 30 days of detecting any of the conditions outlined in 40 CFR 60.113b(a)(2) during the annual visual inspection conducted pursuant to 60.113b(a)(2), if applicable. |
| 40 CFR 60.115b(a)(4) | Furnish a report to the Administrator within 30 days of an inspection conducted pursuant to 40 CFR 60.113b(a)(3) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control requirement defects listed in 40 CFR 60.113b(a)(3)(ii) are found. Each report shall identify the storage vessel, the reason it did not meet the specifications of 40 CFR 60.113b(a)(1) or (a)(3), and list each repair made, if applicable. |
| 40 CFR 60.116b(d) | Notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the maximum true vapor pressure values for the applicable volume range. |

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. None.
- (2) The permittee shall comply with the applicable testing and procedures requirements as specified in 40 CFR 60.113b.

g) Miscellaneous Requirements

- (1) None.