

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Prepared on August 16,1999

Company Name	Sun Company, Inc. (R&M) - Toledo Terminal		
Premise Number	0448010035		
Number of Non-insignificant Emissions Units	7		
What makes this facility a Title V facility?	40 CFR 63.100 (b) SOCOMI HON. The terminal is considered to be a part of the chemical manufacturing process at the Sun Company, Inc. Refinery.		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
J001	10 mg OC per liter gasoline	N	Y	Y	Y	Y	Y	Y	N	<p>BASIS: 40 CFR 63 Subpart R</p> <p>OR -Permittee is required to employ a vapor collection system and operated to prevent gauge pressure in delivery tank from exceeding 4,500 pascals during loading. Minimize spills and make sure the gasoline cargo tanks have vapor tightness documentation.</p> <p>M & R - Permittee shall maintain a carbon adsorption system, document each gasoline cargo tank loading, maintain a logbook of loadings, perform monthly leak inspections of all equipment and maintain a logbook of leaks.</p> <p>Rp - Report semiannually on the number of gasoline cargo tanks with no vapor tightness documentation and the number of leaks not repaired within 5 days.</p> <p>ET - The permittee shall conduct a performance test on the vapor processing system using the test methods and procedures in 40 CFR 60.503 except a reading of 500 ppm shall be used to determine the level of leaks.</p>
J001	----	21-09(Q)	N	N	N	N	N	N	N	<p>BASIS: This limit is less stringent than the limit established in 40 CFR 63.422(b) - Subpart R</p> <p>M&R; Rp & ET - see reason for Basis</p>
J002	----	N	Y	N	Y	Y	Y	Y	N	<p>BASIS: 40 CFR 63 Subpart F, G and H</p> <p>M&R - Recordkeeping of throughput, each HAP and partial pressure of HAP. Equipment identification for those subject to SOCMHON regulations, monitoring of pumps, valves and connectors; leak detection and repair.</p> <p>Rp -Report summary of leaks, repair time,</p> <p>ET - monitoring for VOC leaks with Method 21 of 40 CFR part 60, Appendix A</p>
J002	9.29 TPY VOC	N	31-05	Y	Y	Y	Y	Y	N	<p>BASIS: The TPY limit was to avoid the federal non-attainment review (netting limitations) - synthetic minor PTI</p> <p>OR - Must use submerged fill when unit is in operation</p> <p>M&R - The permittee shall maintain monthly records of the toluene, xylene and mineral spirits throughput in gallons and total for VOC.</p> <p>Rp - Deviation reports of the exceedences of VOC limitation.</p> <p>ET - Permittee shall demonstrate compliance through the monitoring and recordkeeping requirements and the calculations in sections A.III.23.</p>
J002	----	21-07	N	Y	N	Y	Y	N	N	<p>BASIS: This limit is less stringent than the VOC emission limitation established in accordance with BAT requirements of OAC3745-31-05.</p> <p>OR - Must use submerged fill when unit is in operation</p> <p>M&R - document time periods when submerged fill was not used.</p> <p>Rp - Deviation reports</p>

T002, T003 and T009	-----	N	Y	Y	Y	Y	Y	Y	N	<p>BASIS: 40 CFR 63 Subpart R</p> <p>OR - The storage vessel shall be equipped with an internal floating roof and equipped with a closure device between the wall of storage vessel and the edge of the IFR.</p> <p>M&R - The permittee shall visually inspect the IFR and the seals. Records are kept for inspections, the dimension and capacity of the storage vessel</p> <p>Rp - Reports of any tears, defects, etc. and date of repair. Also send a report that describes the control equipment and that it meets specifications stated in the permit.</p> <p>ET - Permittee shall demonstrate compliance by the above recordkeeping and reporting.</p>
T002, T003 and T009	-----	21-09(L)	N	Y	Y	Y	Y	Y	N	<p>OR - The permittee shall insure that bleeder vents are closed at all times and that all openings are equipped with a cover, seal or lid.</p> <p>M&R - The permittee shall maintain records of the types of petroleum stored and the maximum true vapor pressure (psia) greater than 1.0 psia.</p> <p>Rp - Notify TDOES 30 days prior to filling a storage vessel so TDOES can do an internal inspection to afford TDOES the opportunity to have an observer present.</p> <p>ET - Permittee shall demonstrate compliance by the above recordkeeping and reporting.</p>
T011 and T012	-----	N	Y	N	N	Y	N	N	N	<p>BASIS: 40 CFR 63 Subpart F and 40 CFR 63.119 Subpart G - SOCMH HON</p> <p>OR - None</p> <p>M - Only requirement is for recordkeeping (40 CFR 63.119(3))</p> <p>R - The permittee shall record the dimensions of the storage vessel and the capacity for the life of the storage vessel.</p> <p>Rp - Not required - see 40 CFR 63.119(3)</p> <p>ET - None</p>
T011 and T012	-----	21-09(L)	N	N	Y	Y	N	N	N	<p>Basis - The permittee shall insure that bleeder vents are closed at all times and that all openings are equipped with a cover, seal or lid.</p> <p>OR - None</p> <p>M&R - The permittee shall maintain records of the types of petroleum stored and the maximum true vapor pressure (psia) greater than 1.0 psia.</p> <p>Rp - Not required</p> <p>ET - None</p>

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.