



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## **Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: O-0084-16-F

Plant ID: 0084

Effective Date: 00/00/2014

Expiration Date: 00/00/2019

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Buckeye Terminals, LLC  
1500 Southwestern Parkway  
Louisville, Kentucky 40211

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	HAPs
Tons/year:	100	25

Permit Writer: Narathip Chitradon

Date of Public Notice: 02/01/2016

{Manager1}  
Air Pollution Control Officer  
{date1}

**Table of Contents**

Table of Contents ..... 2

FEDOOP Permit Revisions/Changes..... 4

Construction Permit History: ..... 4

Applications ..... 5

Abbreviations and Acronyms ..... 6

Preamble ..... 7

General Conditions ..... 8

Plant-wide ..... 12

    Plant-wide Description..... 12

    Plant-wide Applicable Regulations..... 12

    Plant-Wide Specific Conditions..... 13

    Alternative Operating Scenario..... 19

Emission Units U1: Storage Tanks ..... 20

    U1 Unit Description ..... 20

    U1 Applicable Regulations ..... 20

    U1 Equipment ..... 21

    U1 Controls..... 22

    U1 Specific Conditions ..... 23

Emission Unit U2: Truck Loading Rack ..... 29

    U2 Unit Description ..... 29

    U2 Applicable Regulations ..... 29

    U2 Equipment ..... 29

    U2 Controls..... 30

    U2 Specific Conditions ..... 31

    Alternative Operating Scenario..... 54

Emission Unit U3: Barge Loading and Unloading Operation ..... 55

    U3 Unit Description ..... 55

    U3 Applicable Regulations ..... 55

    U3 Equipment ..... 55

    U3 Controls..... 55

    U3 Specific Conditions ..... 56

Off-Permit Documents ..... 58

Insignificant Activities..... 58  
Protocol Checklist for Performance Test..... 59  
FEDOOP Permit Fee Comment..... 60

DRAFT

**FEDOOP Permit Revisions/Changes**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Page No.	Description
Initial	0069-97-F	04/22/1997	03/16/1997	Initial	Entire Permit	Initial Permit Issuance
R1	0069-97-F-R1	04/05/2000	03/05/2000	Significant	General Conditions [Pages 2-4]	General Conditions #4, #11, #12, and #13 revised; new conditions added #13 and #14 and name change
R2	0069-97-F-R2	05/20/2002	04/14/2002	Significant & permit reissuance	Additional Conditions [Pages 6-18]	Added in applicable regulations and conditions
NA	O-0084-16-F	xx/xx/xxxx	02/01/2016	Renewal	Entire Permit	Renewal; Incorporated Construction Permits 296-05-C (8,000-gallon storage tank), 79-06-C (R1) [350-gallon storage tank, Tank #55], and 347-08-C [carbon adsorption unit]; Incorporated Federal Regulation 40 CFR 63 Subpart BBBBBB

**Construction Permit History:**

Permit No.	Issue Date	Description
79-06-C (R1)	03/31/2009	One (1) 350-gallon storage tank (Tank #55) for a fuel additive (Infineum R693)
347-08-C	04/30/2008	One (1) Jordan Technologies carbon adsorption unit to control emissions from the truck loading rack. Model JT-7082-1000
296-05-C	09/30/2006	One (1) 8,000-gallon horizontal steel storage vessel (diesel fuel additive)

### Applications

<b>Application #</b>	<b>Date Rec'd</b>	<b>Type</b>
7900	11/16/2006	FEDOOP renewal
7901	09/26/2008	Insignificant Activities List – Form 9400-J
30433	06/27/2011	Ownership Change – BP Products North America to Buckeye Terminals, LLC
70682	04/15/2015	Alternative Operating Scenario – Form AP-100G
70984	04/29/2015	Updated 1.05 Compliance Plan
73658	09/30/2015	Application Forms: AP-100A, AP-100B, AP-100G, AP-100P, AP-200E, AP-200J
74237	11/09/2015	Revised Potential to Emit (PTE) calculations and STAR Environmental Acceptability Demonstration

### Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
MSDS	- Material Safety Data Sheet
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SDS	- Safety Data Sheet
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

DRAFT

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit.

HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions

Regulation	Title
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

*Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745*

DRAFT

**Plant-wide<sup>1</sup>****Plant-wide Description**

Distribution of gasoline products

**Plant-wide Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1 through 5
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	110b through 113b, 115b, 116b
40 CFR 63 Subpart A	General Provisions	1 through 16
40 CFR 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	11080-11085, 11087-11089, 11092-11095, 11098-11100

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 through 2
5.01	General Provisions	1 through 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 3, 4.110, 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<sup>1</sup> This section consists of regulations that apply to multiple emission units found at the facility. Regulation 40 CFR Part 63 Subpart BBBBBB is applicable to the equipment found in Emission Units U1, Storage Tanks, as well as U2, Truck Loading Rack. In addition, Regulation 40 CFR Part 63 Subpart BBBBBB includes the fugitive components in gasoline service.

### Plant-Wide Specific Conditions

#### S1. Standards (Regulation 2.17, 5.1)

##### a. VOC

The owner or operator shall limit the total plant-wide VOC emissions from the plant to less than 100 tons during any consecutive 12-month period. [Regulation 2.17, 5.1]

##### b. HAP

- i. The owner or operator shall limit the total plant-wide combined HAPs emissions from the plant to less than 25 tons during any consecutive 12-month period. [Regulation 2.17, 5.1]
- ii. The owner or operator shall limit the total plant-wide single HAP emissions from the plant to less than 10 tons during any consecutive 12-month period for any single HAP. [Regulation 2.17, 5.1]

For Regulation 40 CFR 63 Subpart BBBBBB:

- iii. The owner or operator must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11085(a)]

##### c. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*.<sup>2</sup> [Regulations 5.01 and 5.21]

---

<sup>2</sup> The District received an updated environmental acceptability (EA) demonstration on November 09, 2015 that provided TAC emissions from the facility. The company demonstrated that all processes, except for the truck loading rack operation, were environmentally acceptable due to the uncontrolled potential emissions being below de minimis levels. The company demonstrated that the truck loading rack operation was environmentally acceptable through modeling using controlled potential emissions.

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal. The owner or operator shall monitor and maintain records of the following information.

**a. VOC**

- i. The owner or operator shall perform a daily terminal inspection when the terminal is staffed and document the results. The inspection shall include a visual walkthrough of the terminal storage tanks, loading rack, and vapor recovery unit (VRU) where lines and storage tanks are inspected for any product or vapor leaks and/or equipment malfunctions. If any leaks are detected, corrective actions are to be made to repair the leaks immediately. Leaks are to be reported to the Operations Manager and HSSE (Health, Safety, Security, and Environment). [Regulation 2.17, section 5.2, Regulation 1.05 Compliance Plan, revised April 2015]
- ii. The owner or operator shall monthly maintain records, including calculations, of their calendar month and consecutive 12-month, plant-wide VOC emissions. [Regulation 2.17, section 5.2]

**b. HAP**

- i. The owner or operator shall monthly maintain records, including calculations, of their calendar month and consecutive 12-month, plant-wide combined and single HAP emissions. [Regulation 2.17, section 5.2]
- ii. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS)/Safety Data Sheet (SDS) for each HAP-containing material used at the plant. The MSDS/SDS shall have documentation of the weight percent of each individual HAP. [Regulation 2.17, section 5.2]

For Regulation 40 CFR 63 Subpart BBBBBB:

- iii. Each owner or operator subject to the equipment leak provisions of 40 CFR 63.11089 shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under 40 CFR 63.11089, the record shall contain a full description of the program. [40 CFR 63.11094(d)]
  - 1) Each owner or operator of a bulk gasoline terminal, bulk plant, pipeline breakout station, or pipeline pumping station subject to the provisions of this subpart shall perform a monthly leak inspection of all equipment in gasoline service, as defined in 40 CFR

63.11100 of Subpart BBBBBB<sup>3</sup>. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)]

- 2) A log book shall be used and shall be signed by the owner or operator at the completion of each inspection required by 40 CFR 63.11089(a)<sup>4</sup>. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b)]
  - 3) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided under 40 CFR 63.11089(d). [40 CFR 63.11089(c)]
  - 4) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in 40 CFR 63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(d)]
- iv. Each owner or operator of an affected source subject to equipment leak inspections under 40 CFR 63.11089 shall record in the log book for each leak that is detected the information specified in 40 CFR 63.11094(e)(1) through (7)<sup>5</sup>. [40 CFR 63.11094(e)]
- 1) The equipment type and identification number. [40 CFR 63.11094(e)(1)]
  - 2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). [40 CFR 63.11094(e)(2)]
  - 3) The date the leak was detected and the date of each attempt to repair the leak. [40 CFR 63.11094(e)(3)]
  - 4) Repair methods applied in each attempt to repair the leak. [40 CFR 63.11094(e)(4)]

<sup>3</sup> As defined in 40 CFR 63.11100 of Subpart BBBBBB, equipment means each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).

<sup>4</sup> The monthly leak inspections are logged in *BEST*, Buckeye Emissions & Storage Tanks.

<sup>5</sup> The monthly leak inspections are logged in *BEST*, Buckeye Emissions & Storage Tanks.

- 5) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.11094(e)(5)]
  - 6) The expected date of successful repair of the leak if the leak is not repaired within 15 days. [40 CFR 63.11094(e)(6)]
  - 7) The date of successful repair of the leak. [40 CFR 63.11094(e)(7)]
- v. Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs 40 CFR 63.11094(g)(1) and 40 CFR 63.11094(g)(2). [40 CFR 63.11094(g)]
- 1) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.11094(g)(1)]
  - 2) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11085(a) of Subpart BBBBBB, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.11094(g)(2)]
- c. **TAC**
- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS/SDS, analysis of emissions, and/or modeling results. [Regulation 2.17, section 5.2]
  - ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis* at the time of the change. [Regulation 2.17, section 5.2]
  - iii. The owner or operator shall maintain a copy onsite of the Buckeye Terminal’s STAR Environmental Acceptability Determination and subsequent information provided to the District including all air dispersion modeling input parameters and the resulting associated environmental acceptability goal (EAG) or Risk<sup>6</sup> [Regulation 2.17, section 5.2]

---

<sup>6</sup> An initial STAR Environmental Acceptability Report was received by the District on September 29, 2008. An updated version of the STAR Environmental Acceptability Report was received by the District on November 09, 2015. All TACs from the processes at the facility were below *de minimis*, except controlled benzene emissions for the truck loading operation of gasoline were above *de minimis* levels. In order to demonstrate environmental acceptability, the source performed Tier 3 modeling, using SCREEN3, with a controlled emission rate of 557 lb/yr.

## Results of Adjusted Risk

Emission Unit	TAC	Maximum Annual Concentration ( $\mu\text{g}/\text{m}^3$ )	BACc Benzene ( $\mu\text{g}/\text{m}^3$ )	Individual Process Risk, $R_c$	Individual Process EAG <sub>c</sub>
U2, Truck Loading Rack	Benzene	1.14	0.45	2.5	10.0

## Results of Non-Adjusted Risk

Emission Unit	TAC	Maximum Annual Concentration ( $\mu\text{g}/\text{m}^3$ )	BACc Benzene ( $\mu\text{g}/\text{m}^3$ )	Individual Process Risk, $R_c$	Individual Process EAG <sub>c</sub>
U2, Truck Loading Rack	Benzene	0.16	0.45	0.35	1.0

## S3. Reporting (Regulation 2.17, section 5.2)

## a. VOC

The owner or operator shall annually report their calendar month and consecutive 12-month, plant-wide VOC emissions. [Regulation 2.17, section 5.2]

## b. HAP

i. The owner or operator shall annually report their calendar month and consecutive 12-month, plant-wide combined and single HAP emissions. [Regulation 2.17, section 5.2]

For Regulation 40 CFR 63 Subpart BBBBBB:

The owner or operator shall submit all required compliance reports at least once every six months, unless more frequent reporting is required by an applicable requirement. All reports shall be sent to the District at the address shown in General Condition [17](#) and must be postmarked by the 30<sup>th</sup> day following the end of each reporting period, unless specified elsewhere in this permit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All semi-annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that

---

The company noted the highest individual, process risk to be 2.5, which demonstrates that the company is below the environmental acceptability goal (EAG) of 10.0 for individual processes on industrial property defined under District Regulation 5.21. The company noted the individual, process risk to be 0.35, which demonstrates that the company is below the environmental acceptability goal (EAG) of 1.0.

the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	July 30
July 1 - December 31	January 30 of the following year

- ii. Each owner or operator of any affected source under 40 CFR 63 Subpart BBBBBB must submit additional notifications specified in the General Provisions of 40 CFR 63.9, (Subpart A) as applicable. [40 CFR 63.11093(d)]
- iii. Each owner or operator of a bulk terminal or a pipeline breakout station subject to the control requirements of this subpart shall include in a semiannual compliance report to the Administrator the following information, as applicable: [40 CFR 63.11095(a)]
  - 1) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection, as required under 40 CFR 63.11089(c). [40 CFR 63.11095(a)(3)]
- iv. Each owner or operator of an affected source subject to the control requirements of this subpart shall submit an excess emissions report to the Administrator at the time the semiannual compliance report is submitted. Excess emissions events under this subpart, and the information to be included in the excess emissions report, are specified in 40 CFR 63.11095(b)(5). [40 CFR 63.11095(b)]
  - 1) For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection, as required under 40 CFR 63.11089(c): [40 CFR 63.11095(b)(5)]
    - (a) The date on which the leak was detected; [40 CFR 63.11095(b)(5)(i)]
    - (b) The date of each attempt to repair the leak; [40 CFR 63.11095(b)(5)(ii)]
    - (c) The reasons for the delay of repair; and [40 CFR 63.11095(b)(5)(iii)]
    - (d) The date of successful repair. [40 CFR 63.11095(b)(5)(iv)]

- v. Each owner or operator of an affected source under this subpart shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.11085(a) of Subpart BBBBBB, including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report, if one is required. Owners or operators of affected bulk plants and pipeline pumping stations are not required to submit reports for periods during which no malfunctions occurred. [40 CFR 63.11095(d)]

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions. [Regulation 5.21]
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. [Regulation 5.21 sections 4.22 – 4.24]
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in [S2.c.ii.](#) [Regulation 5.21]

**Alternative Operating Scenario**

The owner or operator is authorized to bring onsite vacuum trucks for temporary maintenance/emergency response usage. The vacuum trucks are not owned by Buckeye Terminals; they are brought from offsite; and the product accumulated in the vacuum trucks is disposed of offsite. The facility shall continue to calculate emissions from this equipment to ensure compliance is maintained<sup>7</sup>.

---

<sup>7</sup> Buckeye Terminals, LLC will record the volume collected by the vacuum trucks in order to help calculate emissions and ensure compliance.

**Emission Units U1: Storage Tanks****U1 Unit Description**

Multiple storage tanks containing various gasoline products.

**U1 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.02	Definitions	Appendix A
1.05	Compliance with Emission Standards and Maintenance Requirements	1 through 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	11080-11085, 11087-11089, 11092-11095, 11098-11100

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 through 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U1 Equipment**

Emission Point ID (Tank ID)	Product Stored	Maximum Capacity (gallons)	Roof Type <sup>a</sup>	Date Installed	Applicable Regulations <sup>b</sup>			
					IA <sup>c</sup>	6.13	6B	STAR
E3 (102)	Gasoline	1,520,404	DIF	1934		X	X	X
E4 (103)	Gasoline	1,391,721	DIF	1932		X	X	X
E5 (104)	Gasoline	1,433,363	DIF	1934		X	X	X
E6 (105)	Gasoline	1,511,094	DIF	1932		X	X	X
E7 (101)	Distillate <sup>e</sup>	992,017	DFR	1934	X			
E8 (106)	Distillate <sup>e</sup>	391,042	CFR	1940	X			
E9 (110)	Distillate <sup>e</sup>	959,204	CFR	1940	X			
E10 (10)	Gasoline Additive	8,000	HFR	1985	X			
E11 (20)	Distillate Additive	10,000	HFR	1985	X			
E16 (25)	Distillate <sup>e</sup>	1,000	HFR	1985	X			
E17 (30)	Gasoline Additive	500	TOTE	2002	X			
E18 (35)	Distillate Additive	120	TOTE	1995	X			
E19 (45)	Empty	2,000	HFR	1985	X			
E20 (50)	Transmix/Slop	250	HFR	1985	X			
E22 (SL-03)	Transmix/Slop	8,000	UST	1985	X			
E23 (55)	Distillate Additive	350	TOTE	2006	X			
E24 (15)	Distillate Additive	6,000	HFR	2005	X			
E25 (107)	Ethanol	374,933	IFR	1940		X		X
E26 (60)	Empty	4,000	HFR	2011	X			

<sup>a</sup> The roof types are the following:

- FR – Vertical, Fixed Roof Storage Tank (No Floating Roof)
- IFR – Vertical, Internal Floating Roof Storage Tank
- CFR - Coned, Vertical, Fixed Roof Storage Tank (No Floating Roof)
- CIF – Coned, Vertical, Internal Floating Roof Storage Tank
- DFR - Domed, Vertical, Fixed Roof Storage Tank (No Floating Roof)
- DIF – Domed, Vertical, Internal Floating Roof Storage Tank
- HFR – Horizontal, Fixed-Roof Storage Tank (No Floating Roof)
- TOTE – Stainless Steel Tote, No Floating Roof
- UST – Horizontal, Underground Storage Tank, No Floating Roof

<sup>b</sup> The storage tanks listed above are also subject to STAR Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

<sup>c</sup> Insignificant Activity. These storage tanks store product that meet the exemption requirements of District Regulation 1.02, Appendix A, Section 3.9.2.

<sup>d</sup> Storage tank was previously listed under the Insignificant Activities Section of Permit 87-97-TV(R1).

<sup>e</sup> Distillate includes kerosene, jet fuel, diesel fuel (all grades), heating oil (all grades), fuel oil (all grades)

## U1 Controls

There are no control devices associated with Emission Unit U1.

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, 5.1)

#### a. VOC

- i. See Plant-Wide Specific Condition [S1.a.](#)

For storage tanks subject to Regulation 6.13:

- ii. For storage tanks E3 through E6, and E25, if the true vapor pressure of the volatile organic compounds as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the owner or operator shall equip the storage vessels with a floating roof, a vapor recovery system, or their equivalents. [Regulation 6.13, section 3.1]
- iii. For storage tanks E3 through E6, and E25, and if the true vapor pressure of the volatile organic compound, as stored, is equal to or greater than 1.5 psia, the owner or operator shall equip the storage vessels with a permanent submerged fill pipe.<sup>8</sup> [Regulation 6.13, section 3.3]

#### b. HAP

See Plant-Wide Specific Conditions [S1.b.i.](#) and [ii.](#)

For Regulation 40 CFR 63 Subpart BBBBBB:

- i. For storage tanks E3 through E6 in Emission Unit U1, the owner or operator must comply with either S1.b.v.1) or 2): [Table 1, 40 CFR 63.11087(a)]
- 1) Equip each internal floating roof gasoline storage tank according to the following applicable requirements of Subpart Kb:<sup>9</sup> [Table 1, Option 2.(b), 40 CFR 63.11087(a) and 40 CFR 60.112b(a)(1)]
- (a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]

<sup>8</sup> Buckeye Terminals, LLC uses the bottom loading method to load/unload product in and out of the storage tanks.

<sup>9</sup> Buckeye Terminals, LLC has equipped each of their gasoline, as well as ethanol, storage tanks with an internal floating roof.

- (b) 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: [40 CFR 60.112b(a)(1)(ii)]
  - (i) 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. [40 CFR 60.112b(a)(1)(ii)(A)]
  - (ii) 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. [40 CFR 60.112b(a)(1)(ii)(C)]
- (c) 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. [40 CFR 60.112b(a)(1)(iii)]

c. **TAC**

See Plant-Wide Specific Condition [S1.c.](#)<sup>10</sup>

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal unless otherwise specified in the permit. The owner or operator shall monitor and maintain records of the following information.

a. **VOC**

- i. See Plant-Wide Specific Condition [S2.a.ii.](#)
- ii. The owner or operator shall maintain readily accessible records of the material stored in each storage vessel. The records shall provide documentation of the content and vapor pressure contained in each storage tank. Records can include a copy of the Material Safety Data

<sup>10</sup> The District received an updated environmental acceptability (EA) demonstration on November 09, 2015 that provided TAC emissions for the company's storage tanks. The information in the report demonstrated that the uncontrolled potential emissions from the storage tanks can be classified as de minimis.

Sheet (MSDS)/Safety Data Sheet (SDS) for each of the products found in the storage tanks. If the contents of the storage vessels are changed, a record shall be made of the new contents, the new vapor pressure, and the date of the change in service. [Regulation 2.17, section 5.2]

For storage tanks subject to Regulation 6.13:

- iii. The owner or operator shall ensure that there shall be no visible holes, tears, or other openings in the seal or any seal fabric<sup>11</sup>. [Regulation 6.13, section 4.1]
  - 1) The owner or operator shall perform and document the results of the annual visual inspections for each storage tank equipped with an internal floating roof. Any issues shall be addressed in accordance with section [S2.b.ii.](#) below. [Regulation 2.17, section 5.2]
- iv. The owner or operator shall ensure that all openings, except stub drains, shall be equipped with covers, lids, or seals such that: [Regulation 6.13, section 4.2]
  - 1) The cover, lid, or seal is in the closed position at all times except when in actual use; and [Regulation 6.13, section 4.2.1]
  - 2) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and [Regulation 6.13, section 4.2.2]
  - 3) Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [Regulation 6.13, section 4.2.3]
- v. The true vapor pressure shall be determined by using the average monthly ambient temperature and typical Reid vapor pressure of the contained liquid or from typical available data on the contained liquid. Supporting analytical data shall be requested by the District if there is a question on the values reported.<sup>12</sup> [Regulation 6.13, section 5.2]

**b. HAP**

- i. See Plant-Wide Specific Condition [S2.b.i.](#)

For Regulation 40 CFR 63 Subpart BBBBBB:

<sup>11</sup> An updated 1.05 compliance plan, received on April 29, 2015, mentions Buckeye Terminals performing annual visual inspections on each internal floating roof of their bulk storage tanks and documenting the results. .

<sup>12</sup> An updated 1.05 compliance plan, received on April 29, 2015, mentions the average monthly product temperature in each storage tanks, the type of product, and the Reid vapor pressure of the product being recorded electronically.

- ii. For storage tanks E3 through E6 in Emission Unit U1, the owner or operator must perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(a) (Subpart Kb) if they are complying with option 2(b) in Table 1. [40 CFR 63.11092(e)(1)]
- 1) Prior to filling the storage vessel with VOL, visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service). 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 owner or operator shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]
  - 2) 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<sup>13</sup>. 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 owner or operator 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 District in the inspection report required in the Reporting and Recordkeeping Requirements of 40 CFR 60.115b(a)(3) (Subpart Kb). 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. [40 CFR 60.113b(a)(2)]
  - 3) 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 owner or operator 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

---

<sup>13</sup> Buckeye Terminals, LLC visually inspects the internal floating roofs annually.

conducting the annual visual inspection as specified in the Testing and Procedures section of 40 CFR 60.113b(a)(2) (Subpart Kb) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a)(4) of the same section. [40 CFR 60.113b(a)(4)]

iii. For storage tanks E3 through E6 (Emission Unit U1) complying with the requirements of option 2(b) in Table 1, the owner or operator shall keep records as specified in the Reporting and Recordkeeping Requirements of 40 CFR 60.115b of Subpart Kb, except records shall be kept for at least 5 years. [40 CFR 63.11094(a)]

1) The owner or operator shall keep a record of each inspection performed as required by the Testing and Procedures section of 40 CFR 60.113b(a)(1), (a)(2), and (a)(4) (Subpart Kb). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]

c. **TAC**

See Plant-Wide Specific Condition [S2.c.](#)

S3. **Reporting (Regulation 2.17, section 5.2)**

a. **VOC**

i. See Plant-Wide Specific Conditions [S3.a.i.](#) and [ii.](#)

For storage tanks subject to Regulation 6.13:

ii. There are no reporting requirements for Regulation 6.13.

b. **HAP**

i. See Plant-Wide Specific Conditions [S3.b.i.](#) and [ii.](#)

For Regulation 40 CFR 63 Subpart BBBBBB:

The owner or operator shall submit all required compliance reports at least once every six months, unless more frequent reporting is required by an applicable requirement. All reports shall be sent to the District at the address shown in General Condition [17](#) and must be postmarked by the 30<sup>th</sup> day following the end of each reporting period, unless specified elsewhere in this permit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any

deviation from a permit requirement or a declaration that there were no such deviations. All semi-annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	July 30
July 1 - December 31	January 30 of the following year

- ii. The owner or operator shall include in a semiannual compliance report, for storage vessels complying with option 2.(b) in Table 1, the following information specified in the Reporting and Recordkeeping requirements of 40 CFR 60.115b(a) (Subpart Kb). [40 CFR 63.11095(a)(1)]
- 1) Furnish the District 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). [40 CFR 60.115b(a)(1)]
  - 2) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Administrator 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. [40 CFR 60.115b(a)(3)]

c. **TAC**

See Plant-Wide Specific Condition [S3.c.](#)

**Emission Unit U2: Truck Loading Rack****U2 Unit Description**

One (1) terminal truck loading rack with control units used to load various finished gasoline products from the bulk terminal storage tanks into cargo tanks for distribution to consumers.

**U2 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.04	Performance Tests	1 through 3
1.05	Compliance with Emission Standards and Maintenance Requirements	1 through 5
40 CFR 60 Subpart A	General Provisions	1 through 18
40 CFR 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals	500 through 503, 505
40 CFR 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	11080-11085, 11087-11089, 11092-11095, 11098-11100

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 through 2
5.01	General Provisions	1 through 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 4.16
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards	1, 2, 3.1, 3.62

**U2 Equipment**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Maximum Capacity</b>	<b>Control Device (Control ID)</b>	<b>Stack ID</b>	<b>Installation Date</b>
E1	One (1) truck	54,000 gal/hr for	C1 & C2	S1	1994

	loading rack consisting of two (2) bays, each bay contains six (6) loading arms	the entire truck loading rack			
--	---	-------------------------------	--	--	--

**U2 Controls**

Control ID	Description	Make/Model	Pollutant Controlled	Installation Date
C1	One (1) dual-bed carbon adsorption vapor recovery unit (VRU) used for collecting and controlling gasoline vapors from the truck loading rack operations	Jordan Technologies JT-7082-1000	VOC	2008
C2	One (1) portable vapor combustion unit (PVCU) used as a backup control unit for loading rack	The following include, but are not limited to, possible models that can be temporarily used by the terminal, depending on availability and service needs: 1) John Zink, Model HPECS 6 2) Jordan, Model JT-PVCU-80-37	VOC	N/A

## U2 Specific Conditions

### S1. Standards (Regulation 2.17, 5.1)

#### a. VOC

- i. See Plant-Wide Specific Condition [S1.a](#).
- ii. Loading of gasoline is not allowed unless the emissions are being controlled by the vapor recovery unit (VRU) or a vapor combustion unit (PVCU).<sup>14</sup> The owner or operator shall control the emissions from the terminal loading rack with a PVCU during all periods of loading gasoline when the VRU is offline. [Regulation 2.17, 5.1]
- iii. The owner or operator shall not allow or cause the throughput of the following product types to exceed the limits during any consecutive 12-month period for the truck loading operation: [Regulation 2.17, section 5.1]

Limit (gal/12-month period)	Product
300,000,000	Gasoline
200,000,000	Distillates <sup>15</sup>

For Regulation 40 CFR 60 Subpart XX:

- iv. Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compound vapors displaced from tank trucks during product loading. [40 CFR 60.502(a)]
- v. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compound per liter of gasoline loaded. [40 CFR 60.502(b)]<sup>16</sup>
- vi. 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. [40 CFR 60.502(d)]
- vii. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR 60.502(e)]

<sup>14</sup> The terminal loading rack at Buckeye Terminals, LLC automatically shuts down if the control device is not operating. If there is an upset or malfunction, the loading and control device automatically shuts down.

<sup>15</sup> Distillates include kerosene, jet fuel, diesel fuel (all grades), heating oil (all grades), fuel oil (all grades).

<sup>16</sup> Buckeye Terminal conducted compliance testing on November 23, 2009 to determine the VOC emissions from the loading of gasoline into tanker trucks. The VOC emission rate was 0.72 mg VOC/liter of gasoline loaded.

- 1) The owner or operator shall obtain the vapor tightness documentation described in the Reporting and Recordkeeping of 40 CFR 60.505(b) (Subpart XX) for each gasoline tank truck, which is to be loaded at the affected facility. [40 CFR 60.502(e)(1)]
- 2) The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [40 CFR 60.502(e)(2)]
- 3) The owner or operator shall cross-check each tank identification number obtained in 40 CFR 502.(e)(2) of Subpart XX 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: [40 CFR 60.502(e)(3)(i)]
  - (a) 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 [40 CFR 60.502(e)(3)(i)(A)]
  - (b) 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 semi-annually. [40 CFR 60.502(e)(3)(i)(B)]
  - (c) If either the quarterly or semiannual cross-check provided in 40 CFR 60.502(e)(3)(i)(A) and (B) of Subpart XX reveals that these conditions were not maintained, the source must return to bi-weekly monitoring until such time as these conditions are again met. [40 CFR 60.502(e)(3)(ii)]
- 4) The terminal owner or operator 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 40 CFR 502.(e)(3) of Subpart XX. [40 CFR 60.502(e)(4)]
- 5) The terminal owner or operator shall take steps assuring that the non-vapor-tight gasoline truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. [40 CFR 60.502(e)(5)]
- 6) Alternative procedures to those described in 40 CFR 502(e)(1) through (5) of Subpart XX for limiting gasoline tank truck loadings may be used upon application to, and approval by, the District. [40 CFR 60.502(e)(6)]

- viii. The owner or operator shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
- ix. The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible emission reminder signs at the affected loading racks<sup>17</sup>. [40 CFR 60.502(g)]
- x. 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 Test Methods and Procedures specified in 40 CFR 60.503(d) (Subpart XX)<sup>18</sup>. [40 CFR 60.502(h)]
- xi. 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 Pascal (450 mm of water). [40 CFR 60.502(i)]

**b. HAP**

- i. See Plant-Wide Specific Conditions [S1.b.i.](#) and [ii.](#)

For Regulation 40 CFR 63 Subpart BBBBBB:

- ii. The owner or operator of a bulk gasoline terminal loading rack(s) with a gasoline throughput (total of all racks) of 250,000 gallons per day<sup>19</sup> or greater must meet each emission limit and management practice in Table 2 to this subpart that applies. [Table 2, Option 1, 40 CFR 63.11088(a)]
  - 1) Equip the loading rack(s) with a vapor collection system designed to collect the TOC (Total Organic Compounds) vapors displaced from cargo tanks during product loading; and [Table 2, 1.(a), 40 CFR 63.11088(a)]

<sup>17</sup> As part of the loading process at Buckeye Terminals, the drivers loading at the loading rack inspect the vapor recovery hose, which connects from the terminal VRU line to the transport trailer line. The drivers are instructed to report any hose deficiencies immediately. Hoses are replaced when there are any indications of damage to the hose itself or the cam-lock fitting. Two spare VRU hoses with fittings are maintained onsite and are readily available for change out.

<sup>18</sup> The Buckeye Terminal facility conducted compliance testing on November 23, 2009 to determine the gauge pressure in the delivery tank during the truck loading operation. The VOC gauge pressure was 127 mm. (5 in.) of water.

<sup>19</sup> Gallons per day is calculated by summing the current day's throughput, plus the throughput for the previous 364 days, and then dividing that sum by 365.

- 2) Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack<sup>20</sup>; and [Table 2, 1.(b), 40 CFR 63.11088(a)]
- 3) Design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere; and [Table 2, 1.(c), 40 CFR 63.11088(a)]
- 4) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR 60.502(e) through (j) of Subpart XX. For the purposes of this section, the term “tank truck” as used in 40 CFR 60.502(e) through (j) of Subpart XX means “cargo tank” as defined in 40 CFR 63.11100 of Subpart BBBB. [Table 2, 1.(d), 40 CFR 63.11088(a)]

**c. TAC**

- i. See Plant-Wide Specific Condition [S1.c.](#)
- ii. The owner or operator shall not allow benzene emissions to exceed 557 pounds during any consecutive 12-month period from the VRU while loading gasoline during truck loading operations. [Regulation 5.21]
- iii. The owner or operator shall control the emissions from the truck loading operation with a vapor recovery unit (VRU) or a vapor combustion unit (PVCU) during all periods of truck loading gasoline. [Regulation 2.17, section 5.1]

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal unless otherwise specified in the permit. The owner or operator shall monitor and maintain records of the following information.

**a. VOC**

- i. See Plant-Wide Specific Condition [S2.a.](#)
- ii. The owner or operator shall perform quarterly maintenance inspections on the vapor recovery unit (VRU) in order to maintain equipment compliance and reliability.<sup>21</sup> [Regulation 2.17, section 5.2, Regulation 1.05 Compliance Plan, revised April 2015]

<sup>20</sup> Compliance with S1.a.v. requirements from 40 CFR 60 Subpart XX will demonstrate compliance with this standard.

<sup>21</sup> Buckeye Terminals, LLC utilizes a third party vendor to perform quarterly Preventative Maintenance Inspections (PMI) on the VRU. PMIs are documented and records are retained at the terminal.

- iii. The owner or operator shall maintain records that identify all periods when the vapor recovery unit was offline and the emissions from the terminal loading rack were being controlled by a portable vapor combustion unit (PVCU). The records shall include the date, duration of time (including the start and stop time) that the emissions were being controlled by PVCU, the product being loaded, and identification of which PVCU was controlling the emissions from the loading rack. [Regulation 2.17, section 5.2]
- iv. The owner or operator shall monthly maintain monthly records that show the quantity, in gallons, of each product type loaded through the truck loading operation. [Regulation 2.17, section 5.2]

For Regulation 40 CFR 60 Subpart XX:

- v. 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<sup>22</sup>. For purposes of this paragraph, 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. [40 CFR 60.502(j)]
- vi. A record of each monthly leak inspection required under the Standard for VOC in 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: [40 CFR 60.505(c)]
  - 1) Date of inspection.
  - 2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - 3) Leak determination method.
  - 4) Corrective action, if any (date each leak repaired; reasons for any repair interval in excess of 15 days).
  - 5) Inspector name and signature.
- vii. Each calendar month, the owner or operator shall visually inspect the tank trailer during loading operations. If any vapor leaks are detected, immediately shut down the loading operations and lock out the trailer

---

<sup>22</sup> The vapor recovery hoses utilized, which connect from the terminal VRU line to the transport trailer line, are inspected daily by the terminal operators. Hoses are replaced when there are any indications of damage to the hose itself or the cam-lock fitting. Two spare VRU hoses with fittings are maintained onsite and are readily available for change out.

until repairs are made to the trailer. All repairs made by the owner or operator of the trailer must be documented by a third-party vendor and proof of repair must be submitted to the personnel at Buckeye Terminals. [Regulation 2.17, section 5.2, Regulation 1.05 Compliance Plan, revised April 2015]

- viii. The tank truck vapor tightness documentation required under the Standard for VOC in 40 CFR 60.502(e)(1) (Subpart XX) shall be kept on file at the terminal in a permanent form available for inspection. [40 CFR 60.505(a)]
- ix. 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. This documentation shall include, as a minimum, the following information: [40 CFR 60.505(b)]
  - 1) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.
  - 2) Tank owner and address.
  - 3) Tank identification number.
  - 4) Testing location.
  - 5) Date of test.
  - 6) Tester name and signature.
  - 7) Witnessing inspector, if any: Name, signature, and affiliation.
  - 8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
- x. The terminal owner or operator shall keep documentation of all notifications required under the Standard for VOC in 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years. [40 CFR 60.505(d)]
- xi. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required under the Reporting and Record Keeping sections of 40 CFR 60.505 (a), (c), and (d), an owner or operator may comply with the requirements in either paragraph (e)(1) or (2). [40 CFR 60.505(e)]
  - 1) An electronic copy of each record is instantly available at the terminal. [40 CFR 60.505(e)(1)]

- (a) The copy of each record in paragraph (e)(1) is an exact duplicate image of the original paper record with certifying signatures. [40 CFR 60.505(e)(1)(i)]
  - (b) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(1). [40 CFR 60.505(e)(1)(ii)]
- 2) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (*e.g.*, via a card lock-out system), a copy of the documentation is made available (*e.g.*, via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. [40 CFR 60.505(e)(2)]
- (a) The copy of each record in paragraph (e)(2) is an exact duplicate image of the original paper record with certifying signatures. [40 CFR 60.505(e)(2)(i)]
  - (b) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2). [40 CFR 60.505(e)(2)(ii)]
- b. **HAP**
- i. See Plant-Wide Specific Condition [S2.b.i.](#)
- For Regulation 40 CFR 63 Subpart BBBBBB:
- ii. Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall keep records of the test results for each gasoline cargo tank loading at the facility as specified in 40 CFR 63.11094(b)(2). [40 CFR 63.11094(b)]
    - 1) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: [40 CFR 63.11094(b)(2)]
      - (a) *Name of test:* Annual Certification Test—Method 27. [40 CFR 63.11094(b)(2)(i)]
      - (b) Cargo tank owner's name and address. [40 CFR 63.11094(b)(2)(ii)]
      - (c) Cargo tank identification number. [40 CFR 63.11094(b)(2)(iii)]

- (d) Test location and date. [40 CFR 63.11094(b)(2)(iv)]
  - (e) Tester name and signature. [40 CFR 63.11094(b)(2)(v)]
  - (f) *Witnessing inspector, if any*: Name, signature, and affiliation. [40 CFR 63.11094(b)(2)(vi)]
  - (g) *Vapor tightness repair*: Nature of repair work and when performed in relation to vapor tightness testing. [40 CFR 63.11094(b)(2)(vii)]
  - (h) *Test results*: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)(2)(viii)]
- iii. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in 40 CFR 63.11094(b), an owner or operator may comply with the requirements in either 40 CFR 63.11094(c)(1) or 40 CFR 63.11094(c)(2). [40 CFR 63.11094(c)]
- 1) An electronic copy of each record is instantly available at the terminal. [40 CFR 63.11094(c)(1)]
    - (a) The copy of each record in 40 CFR 63.11094(c)(1) is an exact duplicate image of the original paper record with certifying signatures. [40 CFR 63.11094(c)(1)(i)]
    - (b) The Administrator is notified in writing that each terminal using this alternative is in compliance with 40 CFR 63.11094(c)(1). [40 CFR 63.11094(c)(1)(ii)]
  - 2) For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Administrator's delegated representatives during the course of a site visit, or within a mutually agreeable time frame.<sup>23</sup> [40 CFR 63.11094(c)(2)]
    - (a) The copy of each record in 40 CFR 63.11094(c)(2) is an exact duplicate image of the original paper record with certifying signatures. [40 CFR 63.11094(c)(2)(i)]

<sup>23</sup> Buckeye Terminals, LLC uses this electronic alternative to maintain compliance.

- (b) The Administrator is notified in writing that each terminal using this alternative is in compliance with 40 CFR 63.11094(c)(2). [40 CFR 63.11094(c)(2)(ii)]
- iv. Each owner or operator of a bulk gasoline terminal shall: [40 CFR 63.11094(f)]
  - 1) Keep an up-to-date, readily accessible record of the continuous monitoring data required under 40 CFR 63.11092(b) or 40 CFR 63.11092(e) of Subpart BBBBBB. This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. [40 CFR 63.11094(f)(1)]
  - 2) Record and report simultaneously with the Notification of Compliance Status required under 40 CFR 63.11093(b) of Subpart BBBBBB: [40 CFR 63.11094(f)(2)]
    - (a) All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under 40 CFR 63.11092(b) or 40 CFR 63.11092(e) of Subpart BBBBBB; and [40 CFR 63.11094(f)(2)(i)]
  - 3) Keep an up-to-date, readily accessible copy of the monitoring and inspection plan required under 40 CFR 63.11092(b)(1)(i)(B)(2) or 40 CFR 63.11092(b)(1)(iii)(B)(2) of Subpart BBBBBB. [40 CFR 63.11094(f)(3)]
  - 4) Keep an up-to-date, readily accessible record of all system malfunctions, as specified in 40 CFR 63.11092(b)(1)(i)(B)(2)(v) or 40 CFR 63.11092(b)(1)(iii)(B)(2)(v) of Subpart BBBBBB. [40 CFR 63.11094(f)(4)]
  - 5) If an owner or operator requests approval to use a vapor processing system or monitor an operating parameter other than those specified in 40 CFR 63.11092(b) of Subpart BBBBBB, the owner or operator shall submit a description of planned reporting and recordkeeping procedures. [40 CFR 63.11094(f)(5)]

c. **TAC**

See Plant-Wide Specific Condition [S2.c.](#)

**S3. Reporting (Regulation 2.17, section 5.2)**

a. **VOC**

- i. See Plant-Wide Specific Conditions [S3.a.i.](#) and [ii.](#)
- ii. The owner or operator shall identify all periods when the vapor recovery unit (VRU) was offline and the emissions from the terminal loading rack were being controlled by the portable vapor combustion unit (PVCU). The report shall include the date, the total number of hours the emissions were being controlled by the PVCU, the product being loaded, identification of which PVCU was controlling the emissions from the loading rack, and the cause or reason the PVCU was used during the truck loading rack operation. If the VRU was used during the entire reporting period, then the owner or operator shall report a negative declaration. [Regulation 2.17, section 5.2]
- iii. The owner or operator shall report the total monthly and consecutive 12-month throughput, in gallons, of each product type loaded through the terminal loading rack during each calendar month in the reporting period. [Regulation 2.17, section 5.2]

For Regulation 40 CFR 60 Subpart XX:

- iv. There are no reporting requirements for 40 CFR 60 Subpart XX.

b. **HAP**

- i. See Plant-Wide Specific Conditions [S3.b.i.](#) and [ii.](#)

For Regulation 40 CFR 63 Subpart BBBBBB:

The owner or operator shall submit all required compliance reports at least once every six months, unless more frequent reporting is required by an applicable requirement. All reports shall be sent to the District at the address shown in General Condition [17](#) and must be postmarked by the 30<sup>th</sup> day following the end of each reporting period, unless specified elsewhere in this permit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All semi-annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	July 30

July 1 - December 31

January 30 of the following year

- ii. Each owner or operator of a bulk terminal or a pipeline breakout station subject to the control requirements of this subpart shall include in a semiannual compliance report to the Administrator the following information, as applicable: [40 CFR 63.11095(a)]
  - 1) For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.11095(a)(2)]
- iii. Each owner or operator of an affected source subject to the control requirements of this subpart shall submit an excess emissions report to the Administrator at the time the semiannual compliance report is submitted. Excess emissions events under this subpart, and the information to be included in the excess emissions report, are specified in 40 CFR 63.11095(b)(1) through (4). [40 CFR 63.11095(b)]
  - 1) Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained. [40 CFR 63.11095(b)(1)]
  - 2) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR 63.11094(b) of Subpart BBBBBB. [40 CFR 63.11095(b)(2)]
  - 3) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under 40 CFR 63.11092(b) of Subpart BBBBBB. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [40 CFR 63.11095(b)(3)]
  - 4) Each instance in which malfunctions discovered during the monitoring and inspections required under 40 CFR 63.11092(b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2) of Subpart BBBBBB were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction. [40 CFR 63.11095(b)(4)]

c. **TAC**

- i. See Plant-Wide Specific Condition [S3.c.](#)

- ii. See Specific Condition [S3.a.ii.](#)

**S4. Testing (Regulation 2.17, section 5.2)**

**a. VOC**

- i. The owner or operator shall conduct a performance test for the truck loading rack within 180 days of permit issuance for purposes of demonstrating ongoing compliance. The owner or operator shall use the most recent District accepted performance test results to demonstrate compliance with the emission limits and in the annual emission inventory reporting.<sup>24</sup> [Regulation 2.17, section 5.2]
- ii. The owner or operator shall submit written compliance test plans (protocol) for the control efficiency<sup>25</sup>. They shall include the EPA test methods that will be used for compliance testing, the process operating parameters that will be monitored during the compliance test, and the control device performance indicators that will be monitored during the compliance test. The compliance test plans shall be furnished to the District at least 30 days prior to the actual date of the compliance test. At the end of the permit is a Protocol [Checklist](#) for Performance Test, which provides the information to be submitted in the protocol. [Regulation 2.17, section 5.2]
- iii. The owner or operator shall provide the District at least 10 days prior notice of any compliance test to afford the District the opportunity to have an observer present. [Regulation 1.04, Section 2.9]
- iv. The owner or operator shall furnish the District with a written report of the results of the compliance test(s) within 60 days following the actual date of completion of the compliance test(s). ) [Regulation 2.17, section 5.2]

For Regulation 40 CFR 60 Subpart XX:

- v. Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart unless the Administrator (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, (3) approves the use of an alternative method the results of which he has determined to be adequate

---

<sup>24</sup> The Buckeye Terminal facility conducted compliance testing on November 23, 2009 to determine the VOC emissions from the loading of gasoline into tanker trucks. The VOC emission rate was 0.72 mg VOC/liter of gasoline loaded.

<sup>25</sup> The District received a test protocol on October 23, 2009 from Buckeye Terminals. As required by 40 CFR 60 Subpart XX, the facility conducted their compliance test on November 23, 2009 to determine the VOC emissions from the loading of gasoline into tanker trucks. The facility obtained a control efficiency of 99.90% during their compliance test.

for indicating whether a specific source is in compliance, (4) waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Administrator's satisfaction that the affected facility is in compliance with the standard, or (5) approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Administrator's authority to require testing under section 114 of the Act. [40 CFR 60.8(b)]

- vi. In conducting the performance tests required in 40 CFR 60.8 of the General Provisions, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of this part or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b) of the General Provisions. The three-run requirement for the Performance Tests in 40 CFR 60.8(f) of the General Provisions does not apply to this subpart. [40 CFR 60.503(a)]
- vii. Immediately before the performance test required to determine compliance with the Standard for VOC in 40 CFR 60.502(b) and (h), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.<sup>26</sup> [40 CFR 60.503(b)]
- viii. The owner or operator shall determine compliance with the Standard for VOC in 40 CFR 60.502(b) (Subpart XX) as follows: [40 CFR 60.503(c)]
  - 1) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.<sup>27</sup> [40 CFR 60.503(c)(1)]
  - 2) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled. [40 CFR 60.503(c)(2)]

<sup>26</sup> The compliance test was conducted on November 23, 2009. As required, the facility used EPA Test Method 21 to monitor for any potential leak sources before conducting their compliance test.

<sup>27</sup> The compliance test was conducted on November 23, 2009. The facility conducted the performance test for 6 hours and loaded 159,250 gallons (602,761 liters) of gasoline.

- 3) The emission rate (E) of total organic compounds shall be computed using the following equation: [40 CFR 60.503(c)(3)]

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) / (L 10^6)$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

$V_{esi}$  = volume of air-vapor mixture exhausted at each interval "i", scm.

$C_{ei}$  = concentration of total organic compounds at each interval "i", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.

i = emission testing interval of 5 minutes.

K = density of calibration gas,  $1.83 \times 10^6$  for propane and  $2.41 \times 10^6$  for butane, mg/scm.

- 4) The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted ( $V_{esi}$ ) and the corresponding average total organic compounds concentration ( $C_{ei}$ ) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted. [40 CFR 60.503(c)(4)]
- 5) The following methods shall be used to determine the volume ( $V_{esi}$ ) air-vapor mixture exhausted at each interval:<sup>28</sup> [40 CFR 60.503(c)(5)]
- (a) Method 2B shall be used for combustion vapor processing systems. [40 CFR 60.503(c)(5)(i)]
  - (b) Method 2A shall be used for all other vapor processing systems. [40 CFR 60.503(c)(5)(ii)]
- 6) Method 25A or 25B shall be used for determining the total organic compounds concentration ( $C_{ei}$ ) at each interval. The calibration gas shall be either propane or butane. The owner or operator may exclude the methane and ethane content in the exhaust vent by any

<sup>28</sup> The compliance test was conducted on November 23, 2009. Volume measurements were obtained by the facility using EPA Test Method 2A.

method (e.g., Method 18) approved by the Administrator.<sup>29</sup> [40 CFR 60.503(c)(6)]

- 7) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used. [40CFR 60.503(c)(7)]
- ix. The owner or operator shall determine compliance with the standard in 40 CFR 60.502(h) as follows: [40 CFR 60.503(d)]
- 1) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck. [40 CFR 60.503(d)(1)]
  - 2) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test. [40 CFR 60.503(d)(2)]

b. **HAP**

For Regulation 40 CFR 63 Subpart BBBBBB:

- x. Each owner or operator of an affected bulk gasoline terminal under this subpart must submit a Notification of Performance Test, as specified in the General Provisions of 40 CFR 63.9(e) (Subpart A), prior to initiating testing required by 40 CFR 63.11092(a) or 40 CFR 63.11092(b) of Subpart BBBBBB<sup>30</sup>. [40 CFR 63.11093(c)]
- xi. Each owner or operator of a bulk gasoline terminal subject to the 80 mg/l emission standard for bulk terminal gasoline loading rack(s) with a gasoline throughput of 250,000 gallons per day or greater must comply with the requirements in 40 CFR 63.11092(a) through (d). [40 CFR 63.11092(a)]

<sup>29</sup> The compliance test was conducted on November 23, 2009. VOC concentration measurements were obtained by the facility using EPA Test Method 25B.

<sup>30</sup> The Buckeye Terminal facility conducted compliance testing on November 23, 2009 to determine the VOC emissions from the loading of gasoline into tanker trucks. The VOC emission rate was 0.72 mg VOC/liter of gasoline loaded.

- 1) Conduct a performance test on the vapor processing and collection systems according to either 40 CFR 63.11092(a)(1)(i) or 40 CFR 63.11092(a)(1)(ii). [40 CFR 63.11092(a)(1)]
  - (a) Use the test methods and procedures found in 40 CFR 60.503 of Subpart XX, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under 40 CFR 60.503(b). [40 CFR 63.11092(a)(1)(i)]
  - (b) Use alternative test methods and procedures in accordance with the alternative test method requirements in 40 CFR 63.7(f) of the General Provisions (Subpart A). [40 CFR 63.11092(a)(1)(ii)]
- xii. Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems, as specified in 40 CFR 11092(b)(1) through (4). [40 CFR 63.11092(b)]
  - 1) For each performance test conducted under 40 CFR 11092(a)(1), the owner or operator shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in 40 CFR 11092(b)(1)(i), (iii), or (iv). During the performance test, continuously record the operating parameter as specified under 40 CFR 11092(b)(1)(i), (iii), or (iv).<sup>31</sup> [40 CFR 63.11092(b)(1)]
    - (a) Where a carbon adsorption system is used, the owner or operator shall monitor the operation of the system as specified in 40 CFR 11092(b)(1)(i)(A) or (B).<sup>32</sup> [40 CFR 63.11092(b)(1)(i)]
      - (i) A continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream. [40 CFR 63.11092(b)(1)(i)(A)]
      - (ii) As an alternative to 40 CFR 63.11092(b)(1)(i)(A), you may choose to meet the requirements listed in

<sup>31</sup> Buckeye Terminals, LLC has elected to observe the vacuum level as their monitor operating parameter value for the vapor recovery unit (VRU). The lowest maximum required vacuum level needed to assure regeneration of the carbon beds in the VRU is 25" Hg. The parameter value was obtained from the Notification of Compliance Status (NOCS) received on January 10, 2011.

<sup>32</sup> Buckeye Terminals, LLC has elected to operate the system using the alternative to 40 CFR 63.11092(b)(1)(i)(A).

40 CFR 63.11092(b)(1)(i)(B)(I) and (2). [40 CFR 63.11092(b)(1)(i)(B)]

- (1) Carbon adsorption devices shall be monitored as specified in 40 CFR 63.11092(b)(1)(i)(B)(I)(i),(ii), and (iii). [40 CFR 63.11092(b)(1)(i)(B)(1)]
- a) Vacuum level shall be monitored using a pressure transmitter installed in the vacuum pump suction line, with the measurements displayed on a gauge that can be visually observed. Each carbon bed shall be observed during one complete regeneration cycle on each day of operation of the loading rack to determine the maximum vacuum level achieved. [40 CFR 63.11092(b)(1)(i)(B)(1)(i)]
  - b) Conduct annual testing of the carbon activity for the carbon in each carbon bed. Carbon activity shall be tested in accordance with the butane working capacity test of the American Society for Testing and Materials (ASTM) Method D 5228-92 (incorporated by reference, see 40 CFR 63.14 of the General Provisions), or by another suitable procedure as recommended by the manufacturer. [40 CFR 63.11092(b)(1)(i)(B)(1)(ii)]
  - c) Conduct monthly measurements of the carbon bed outlet volatile organic compounds (VOC) concentration over the last 5 minutes of an adsorption cycle for each carbon bed, documenting the highest measured VOC concentration. Measurements shall be made using a portable analyzer, or a permanently mounted analyzer, in accordance with 40 CFR part 60, Appendix A-7, EPA Method 21 for open-ended lines. [40 CFR 63.11092(b)(1)(i)(B)(1)(iii)]

- (2) Develop and submit to the Administrator a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements in 40 CFR 63.11092(b)(1)(i)(B)(2)(i) through (v)<sup>33</sup>. [40 CFR 63.11092(b)(1)(i)(B)(2)]
- a) The lowest maximum required vacuum level and duration needed to assure regeneration of the carbon beds shall be determined by an engineering analysis or from the manufacturer's recommendation and shall be documented in the monitoring and inspection plan.<sup>34</sup> [40 CFR 63.11092(b)(1)(i)(B)(2)(i)]
- b) The owner or operator shall verify, during each day of operation of the loading rack, the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used. [40 CFR 63.11092(b)(1)(i)(B)(2)(ii)]
- c) The owner or operator shall perform semi-annual preventive maintenance inspections of the carbon adsorption system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system. [40 CFR 63.11092(b)(1)(i)(B)(2)(iii)]
- d) The monitoring plan developed under 40 CFR 63.11092(b)(1)(i)(B)(2) shall

<sup>33</sup> The District received a Monitoring and Inspection Plan on December 2010.

<sup>34</sup> For Buckeye Terminals, LLC, the lowest maximum required vacuum level needed to assure regeneration of the carbon beds in the VRU is 25" Hg, as provided in the NOCS received on January 10, 2011.

specify conditions that would be considered malfunctions of the carbon adsorption system during the inspections or automated monitoring performed under 40 CFR 63.11092(b)(1)(i)(B)(2)(i) through (iii), describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction. [40 CFR 63.11092(b)(1)(i)(B)(2)(iv)]

e) The owner or operator shall document the maximum vacuum level observed on each carbon bed from each daily inspection and the maximum VOC concentration observed from each carbon bed on each monthly inspection as well as any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction. [40 CFR 63.11092(b)(1)(i)(B)(2)(v)]

(b) Where a thermal oxidation system other than a flare is used, the owner or operator shall monitor the operation of the system as specified in 40 CFR 63.11092(b)(1)(iii)(A) or (B). [40 CFR 63.11092(b)(1)(iii)]

(i) A continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs. [40 CFR 63.11092(b)(1)(iii)(A)]

- (ii) As an alternative to 40 CFR 63.11092(b)(1)(iii)(A), the owner or operator may choose to meet the requirements listed in 40 CFR 63.11092(b)(1)(iii)(B)(1) and (2). [40 CFR 63.11092(b)(1)(iii)(B)]
- (1) The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off. [40 CFR 63.11092(b)(1)(iii)(B)(1)]
- (2) Develop and submit to the Administrator a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements in 40 CFR 63.11092(b)(1)(iii)(B)(2)(i) through (v). [40 CFR 63.11092(b)(1)(iii)(B)(2)]
- a) The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent. [40 CFR 63.11092(b)(1)(iii)(B)(2)(i)]
- b) The owner or operator shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used. [40 CFR 63.11092(b)(1)(iii)(B)(2)(ii)]

- c) The owner or operator shall perform semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system. [40 CFR 63.11092(b)(1)(iii)(B)(2)(iii)]
- d) The monitoring plan developed under 40 CFR 63.11092(b)(1)(iii)(B)(2) shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under 40 CFR 63.11092(b)(1)(iii)(B)(2)(ii) and (iii), describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction. [40 CFR 63.11092(b)(1)(iii)(B)(2)(iv)]
- e) The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction. [40 CFR 63.11092(b)(1)(iii)(B)(2)(v)]
- (c) Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in 40 CFR 63.11092(b)(1)(i) and (iii) will be allowed upon demonstrating to the Administrator's satisfaction that the alternative parameter demonstrates continuous

- compliance with the emission standard in 40 CFR 63.11088(a). [40 CFR 63.11092(b)(1)(iv)]
- 2) Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations. [40 CFR 63.11092(b)(3)]
  - 3) Provide for the Administrator's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in 40 CFR 63.11088(a). [40 CFR 63.11092(b)(4)]
- xiii. For performance tests performed after the initial test required under 40 CFR 63.11092(a), the owner or operator shall document the reasons for any change in the operating parameter value since the previous performance test. [40 CFR 63.11092(c)]
- xiv. Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall comply with the requirements in 40 CFR 63.11092(d)(1) through (4). [40 CFR 63.11092(d)]
- 1) Operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters described in 40 CFR 63.11092(b)(1). [40 CFR 63.11092(d)(1)]
  - 2) In cases where an alternative parameter pursuant to 40 CFR 63.11092(b)(1)(iv) is approved, each owner or operator shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the alternative operating parameter value. [40 CFR 63.11092(d)(2)]
  - 3) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in 40 CFR 63.11088(a), except as specified in 40 CFR 63.11092(d)(4). [40 CFR 63.11092(d)(3)]
  - 4) For the monitoring and inspection, as required under 40 CFR 63.11092(b)(1)(i)(B)(2) and 40 CFR 63.11092(b)(1)(iii)(B)(2), malfunctions that are discovered shall not constitute a violation of the emission standard in 40 CFR 63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The owner or operator must: [40 CFR 63.11092(d)(4)]

- (a) Initiate corrective action to determine the cause of the problem within 1 hour; [40 CFR 63.11092(d)(4)(i)]
  - (b) Initiate corrective action to fix the problem within 24 hours; [40 CFR 63.11092(d)(4)(ii)]
  - (c) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions; [40 CFR 63.11092(d)(4)(iii)]
  - (d) Minimize periods of start-up, shutdown, or malfunction; and [40 CFR 63.11092(d)(4)(iv)]
  - (e) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem. [40 CFR 63.11092(d)(4)(v)]
- xv. The annual certification test for gasoline cargo tanks shall consist of the test methods specified in 40 CFR 63.11092(f)(1). Affected facilities that are subject to subpart XX of 40 CFR part 60 may elect, after notification to the subpart XX delegated authority, to comply with 40 CFR 63.11092(f)(1). [40 CFR 63.11092(f)]
- 1) *EPA Method 27, Appendix A–8, 40 CFR part 60.* Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure ( $P_i$ ) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum ( $V_i$ ) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes ( $\Delta p$ ,  $\Delta v$ ) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes. [40 CFR 63.11092(f)(1)]
- xvi. *Conduct of performance tests.* Performance tests conducted for this subpart shall be conducted under such conditions as the Administrator specifies to the owner or operator, based on representative performance (*i.e.*, performance based on normal operating conditions) of the affected source. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests. [40 CFR 63.11092(g)]
- c. **TAC**
- There are no testing requirements for this equipment.

### **Alternative Operating Scenario**

The owner or operator shall be allowed to utilize the portable vapor combustion unit (PVCU) during emergency shutdowns or other periods of downtime of the vapor recovery unit (VRU). Loading of gasoline is not allowed unless the emissions are being controlled by the VRU or the PVCU. The facility shall continue to follow the requirements for the PVCU and VRU listed under the Monitoring and Record Keeping, and Reporting sections of this Emission Unit. The facility shall continue to monitor loading rates and calculate emissions to ensure compliance is maintained.

DRAFT

### Emission Unit U3: Barge Loading and Unloading Operation

#### U3 Unit Description

One (1) barge loading and unloading operation used to transfer gasoline products from barges into storage tanks (unloading), as well as load various finished gasoline products from the bulk terminal storage tanks onto barges (loading).

#### U3 Applicable Regulations

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1 through 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

#### U3 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Control Device (Control ID)	Stack ID	Installation Date
E2	One (1) barge loading and unloading operation	147,000 gal/hr for the barge loading operation	N/A	N/A	1957

#### U3 Controls

There are no control devices associated with Emission Unit U3.

### U3 Specific Conditions

#### S1. Standards (Regulation 2.17, 5.1)

##### a. VOC

- i. See Plant-Wide Specific Condition [S1.a.](#)
- ii. The owner or operator shall not allow or cause the throughput of distillate to exceed 50,000,000 gal/yr during any consecutive 12-month period for the barge loading operation: [Regulation 2.17, 5.1]

##### b. HAP

See Plant-Wide Specific Conditions [S1.b.i.](#) and [ii.](#)

##### c. TAC

See Plant-Wide Specific Condition [S1.c.](#)

#### S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal unless otherwise specified in the permit. The owner or operator shall monitor and maintain records of the following information.

##### a. VOC

- i. See Plant-Wide Specific Condition [S2.a.](#)
- ii. The owner or operator shall maintain records that show the quantity, in gallons, of each product type loaded through the barge loading operation. [Regulation 2.17, section 5.2]

##### b. HAP

See Plant-Wide Specific Condition [S2.b.i.](#)

##### c. TAC

See Plant-Wide Specific Condition [S2.c.](#)

#### S3. Reporting (Regulation 2.16, section 4.1.9.3)

##### a. VOC

- i. See Plant-Wide Specific Conditions [S3.a.i.](#) and [ii.](#)

- ii. The owner or operator shall report the total monthly and consecutive 12-month throughput, in gallons, of each product type loaded through the barge loading operation during each calendar month in the reporting period. [Regulation 2.17, section 5.2]

b. **HAP**

See Plant-Wide Specific Conditions [S3.b.i.](#) and [ii.](#)

c. **TAC**

See Plant-Wide Specific Condition [S3.c.](#)

DRAFT

### Off-Permit Documents

A revised 1.05 Compliance Plan referenced in this permit was received on April 29, 2015. A previous version of the 1.05 Compliance Plan was received on June 11, 1993.

### Insignificant Activities

Equipment	Quantity	Basis for Exemption
Indirect heat exchangers less than 10 MMBtu/hr, except those that burn waste oil [Hot water heater, Capacity: 140,000 BTU/hr, Fuels burned: distillate]	1	Regulation 1.02, Appendix A, sec. 1.1
Stationary emergency generator [Make: Generac, Model: 90A 01403 S, Capacity: 1,800 RPM or 15 KW]	1	Regulation 1.02, sec. 1.38.1.1
Vacuum trucks rented and brought onsite to be utilized for temporary maintenance/emergency response usage	Up to 2	Regulation 1.02, sec. 1.38.1.1
Oil-water separator recovering less than 200 gallons a day	1	Regulation 7.36, sec. 1

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

### Protocol Checklist for Performance Test

A completed protocol should include the following information:

- Facility Name, Location, and ID #;
- Responsible Official and Environmental Contact Names;
- Permit #s which are requiring the test to be conducted;
- Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- Alternative test methods or description of modifications to the test methods to be used;
- Purpose of the test including equipment, and pollutant to be tested; the purpose may be described in the permit which requires the test to be conducted or may be to show compliance with a Federal Regulation or emission standard;
- Tentative test dates (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.);
- Maximum rated production capacity of the system;
- Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits);
- Method to be used for determining rate of production during the performance test;
- Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- Description of normal operation cycles;
- Discussion of operating conditions that tend to cause worse case pollution emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- Process Flow Diagram;
- List the type and manufacturer of the control equipment if any;
- The control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test. Note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- How quality assurance and accuracy of the data will be maintained, including;
  - Sample identification and chain-of-custody procedures
  - If audit samples are required for this test method, audit sample provider and number of audit samples to be used
- Pipe, duct, stack, or flue diameter to be tested;
- Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
  - Method 1 if stack diameter is >12"
  - Method 1a if stack diameter is greater than or equal to 4" and less than 12"
  - Alternate method of determination for <4"
  - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Method 1, Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.
- The Stack Test Review fee shall be submitted with each stack test protocol.

**FEDOOP Permit Fee Comment**

The permit fee is in accordance with District Regulation 2.08 and arrived to the following amount:

NESHAP Review (40 CFR 63 Subpart BBBBBB - \$516.52 40 CFR 63 Subpart ZZZZ - \$516.52)	\$1,033.04
STAR - EA Demo (Tier 3 Modeling, updated EA Demo was received on November 09, 2015 due to updated potential emission calculations, de minimis thresholds, and Benchmark Ambient Concentrations)	\$1,549.55

The total fee for this permit is **\$2582.59**

DRAFT