

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

(DRAFT) Air Permit Review

Permit Issue Date:

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100272
Inspector's Name: Hilary King
Date of Last Inspection: 09/15/2005
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Colonial Pipeline Company Facility Address: Colonial Pipeline Company 411 Gallimore Dairy Road Greensboro, NC 27409 SIC: 4613 / Refined Petroleum Pipe Lines NAICS: 48691 / Pipeline Transportation of Refined Petroleum Products Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100272.05A Date Received: 01/28/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02939/T19 Existing Permit Issue Date: 11/22/2000 Existing Permit Expiration Date: 10/31/2005
Faron Leigh Mid-Atlantic District Environmental Tech (336) 294-9737 411 Gallimore Dairy Road Greensboro NC, 27409	Darren Pruitt Operations Manager (336) 931-6025 411 Gallimore Dairy Road Greensboro NC, 27409	Tom Kelly Interim Environmental Manager (678) 762-2265 P O Box 1624 Alpharetta GA, 30009+9934	
Review Engineer: Gautam Patnaik Review Engineer's Signature: _____ Date: _____		Comments / Recommendations:	
		Issue 02939/T20 Permit Issue Date: Permit Expiration Date:	

1. Facility Description.

As per the Regional Office the facility is a petroleum pipeline breakout station that directs liquid petroleum products to customers downstream along the pipeline. It also supplies many of the local bulk terminals. The facility operates 8760 hours per year.

2. Purpose of Application

The application is for the renewal of their current permit 02939T19 which expired on October 31, 2005. Air permit 02939T19 was also their initial title V permit issued on November 22, 2000 and there has been no modification of this permit.

The application is also for the addition of two fuel oil tanks (I855) and (I857) as insignificant sources.

3. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 2D .0925: Petroleum Liquid Storage in Fixed Roof Tanks

15A NCAC 2D .0927: Bulk Gasoline Terminals

15A NCAC 2D .0524: New Source Performance Standards (40 CFR 60 Subpart Ka)

15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions (*State-enforceable only*)

15A NCAC 2D .1111: Maximum Achievable Control Technology (40 CFR 63 Subpart R)

No new or additional requirements have been added to this renewed permit since the Initial Title V Permit was issued. Therefore, a specific regulatory review was not included in this review.

4. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

The two above ground storage tanks (ID Nos. 863 and 864) are subject to NSPS Subpart Ka and appeared to be in compliance.

NESHAP/MACT

The entire facility is subject to Gasoline Distribution MACT (40 CFR 63 Subpart R); however only the equipment in gasoline service is required to meet the applicable standards. A Leak Detection and Repair (LDAR) is in place, which utilizes sight, sound, and smell as a detection method.

PSD

The minor baseline dates for Guilford County has been triggered for PM10 and SO2 for since 3/6/84. Guilford County is a non attainment County for ozone. However, it is also an EAC (Early Action Compact) County.

This modification did not increase any emissions of any criteria pollutant, Therefore, no emissions tracking for these pollutants will be required at this time for PSD Class II increment purposes.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

This facility does not have any control devices and thus, CAM does not apply.

5. Facility Wide Air Toxics

2Q .0702(a)(28) exempts “bulk gasoline terminals, including the storage and handling of fuel oils” from the the state-only toxics regulations (2Q .0700). Thus, the facility-wide air toxics review required by the compliance date of the last applicable MACT pursuant to 2Q .0705 is not required.

6. Miscellaneous

A zoning consistency determination as per 2Q .0304(b) was not required.

This application did not require a " Professional Engineer Seal.”

The latest inspection report for the inspection done on September 15, 2005 (as per documents on IBEAM) indicates that the facility was in compliance.

The current permit does not have a Part II. The new permit also does not have a Part II since this is a renewal and there are no new construction taking place.

The application for this renewal had listed two tanks for 200,000 bbls were to be constructed. On 6/6/06 the applicant informed us that these two (I855) and (I857) additional fuel oil tanks were already constructed and should be added to the insignificant sources list.

7. Applicant and Regional Office comments.

The applicant and the Regional Office were both given a copy of the draft permit and their comments taken into account.

Some of the applicant’s comments and action taken are noted below:

Page 4

- Changed description for fuel oil, diesel, and kerosene tanks to distillate

850* to 882 - 883* are all changed to ‘distillate storage tanks’

Q - 863-864 - NSPS kerosene storage tanks - 218,000 each - domed internal floating roof, each (are they still subject to NSPS)

- Removed NSPS from description for Tanks 863 & 864. (Justification)? – same as above.
- Removed asterisk for 885-896 (Justification)?
- Removed Remediation system (moved to insignificant sources) (Justify)

~ Added Tank 855* and 857* (moved from insignificant sources) wanted to keep all breakout tankage together. (Might be hard for an inspector?)

Pages 5 and 6

- Added Tanks 885-896 to descriptions for applicable tanks under Section 2.1 A and B
- Q - Fifty seven not Thirty-four

Page 7

- Deleted Section C: Tanks 863 and 864 are not subject to Subpart Ka requirements because they are well below the true vapor pressure threshold under 40 CFR 60.
- Change Section D to Section C

Page 8

- Changed listing of Tanks with No Applicable Requirements to read as follows: **“Twenty five Distillate storage tanks (ID Nos. 850 - 857, 860-864, and 870-883.”**
- **Moved Tanks 885-896 to Section 2.1**
- **Moved Tank 899 and Remediation System to Insignificant Activities List**

8. Permit Modification/Changes

The following table describes the modifications to the current permit as part of the modification process.

Page(s)	Section	Description of Change(s)
	Insignificant Activities list	added two additional fuel oil tanks (I855) and (I857)
page 9	General Conditions	The general conditions were updated