

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **Date, 2011**

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100268
Inspector's Name: Jennifer White
Date of Last Inspection: 08/12/2010
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Plantation Pipe Line Company</p> <p>Facility Address: Plantation Pipe Line Company 6907A West Market Street Greensboro, NC 27409</p> <p>SIC: 4613 / Refined Petroleum Pipe Lines NAICS: 48691 / Pipeline Transportation of Refined Petroleum Products</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 15A NCAC 2D .1111 (40 CFR 63, Subpart ZZZZ)</p> <p>NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 4100268.10A Date Received: 06/29/2010 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 03980/T10 Existing Permit Issue Date: 04/13/2006 Existing Permit Expiration Date: 03/31/2011</p>
<p>Murray Clayton, Jr. Operations Manager (336) 547-3661 6907-A West Market Street Greensboro, NC 27409</p>	<p>Wayne Simmons Director, Plantation Field Operations (770) 751-4154 1100 Alderman Dr. Suite 200 Alpharetta, GA 30005</p>	<p>Matthew Marra Director, Compliance (770) 751-4160 1100 Alderman Dr. Suite 200 Alpharetta, GA 30005</p>	

<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2011</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03980/T11 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016</p>
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I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**03980T10**) was issued on **April 13, 2006**, with an expiration date of **March 31, 2011**. The renewal application was received on **June 29, 2009**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

In addition to the request to renew the permit, the Permittee has requested the following administrative changes to the permit:

1. add a reference to two insignificant diesel-fired emergency fire pumps; and
2. change the product service of tanks (**ID Nos. GN170 and GN171**) to distillate service as these tanks have always been in distillate service and there are no plans to change.

II. Facility Description

The facility is a breakout station for the Plantation Pipe Line Company. Materials including gasoline and distillates travel through the pipeline from the Gulf Coast. The material arrives at the facility and is either pumped further down the line or is stored in one of the storage tanks on-site. After being stored on-site, the material can be pumped to bulk terminals where it can be shipped via tank truck. There are no loading areas at this facility.

III. History/Background/Application Chronology

April 13, 2006 – Permit **03980T10** issued as a TV renewal.

June 29, 2010 – Permit application **4100268.10A** received for the renewal of the TV permit. Application deemed complete for processing and assigned to David Putney for processing.

August 12, 2010 – Jennifer White of the WSRO completed annual facility inspection.

September 29, 2010 – Permit application **4100268.10A** reassigned to Mark Cuilla for processing.

January 7, 2011 – Draft permit sent to regional office and Permittee for review prior to public notice and EPA review. The Permittee submitted the following comments via email on January 21, 2011 (DAQ's are responses in italics):

1. As of November of 2005 Greensboro Tank Farm could only receive conventional gasoline with MTBE less than 0.25 percent volume and 0.5 percent volume. This change of the formulation of gasoline significantly reduces the Hazardous Air Pollutant MTBE. Plantation is reviewing the applicability of 63.420 as it plays to our facility. *DAQ will evaluate the applicability of this Subpart upon submittal of any evaluation by the Permittee.*
2. Change product description from "Kerosene" to Distillate (Section 1 Emission Source Table, GN172). *Agree, permit will be modified as requested.*
3. Change product description from "gasoline" to "transmix". This tank is a transmix tank and transmix, a mixture of petroleum distillates, does not meet the definition of gasoline (as the Reid vapor pressure is less than 27.6 kilopascals which is used as a fuel for internal combustion engines). Please remove the MACT, Subpart R designation as well. See amendments to subpart BBBBBB signed January 11, 2011 (Section 1 Emission Source Table, GNCT-1). *Agree, permit will be modified as requested. Asterisk language describing the definition of transmix and its applicability to the area source GACT has been added to the renewed permit. EPA has noted that transmix is not subject to the requirements of the area source GACT; it is safe to assume that the same rationale for its exemption in the GACT can be extended to the MACT.*
4. Remove GNCT1 from sources (Section 2.1.A.1.a and 2.1.A.1.b). *Agree, permit will be modified as requested.*
5. Remove GNCT1 from sources (Section 2.1.B.1.a-f). *Agree, permit will be modified as requested.*
6. This Section should be removed as Sources Tanks GN170 and GN171 are in distillate service and are exempt from these requirements as distillate does not have a true vapor pressure exceed 1.52 pounds per square inch absolute (Section 2.1.C). *Agree, permit will be modified as requested. See Section V of this Document for a discussion.*
7. The reference to 63.425 should be removed as a reference as section 63.425 is related to test methods and procedures for vapor processing and collection systems. Plantation does not have this type of equipment. The sole reference for this section should be 60.113b (Section 2.E.1.f). *Agree, the permit will be modified to include the following clarification to state that per 63.425, "the Permittee is required to comply with the testing procedures of Subpart Kb (40 CFR 60.113b) as follows."*

8. The reference to 63.427 “Continuous Monitoring Section” should be removed as a reference because section 63.427 is related to bulk gasoline terminals. This sections should be called “Monitoring of Operations.” The requirement for a Continuous Monitoring System is not required. This facility is by definition a pipeline breakout station. Only standards from Kb apply (Section 2.E.1.g). *Agree, the permit will be modified to include the following clarification to state that per 63.427, “the Permittee is required to comply with the monitoring requirements of Subpart Kb (40 CFR 60.116b) as follows.” It should be noted, that this same type of correction will be made for the reference of 40 CFR 63.428 Recordkeeping and Reporting.*
9. This facility only stores petroleum products and does not store other liquids or waste in storage vessels subject to subpart Kb (Section E.1.g.iv.C). *Agree. No change to the draft permit is needed as this language is directly from the subpart.*
10. It is Plantation understanding the report referenced in this section was submitted as an attachment to the initial notification submitted to the Agency as required in 63.428(a) and therefore this report is not required. It is also our understanding that sections (b), (c) and (k) applies only to gasoline bulk terminals (Section E.1.h.i.A). *Agree. This Section further describes that this submittal should be an attachment to the notification required by 40 CFR 60.7(a)(3). This notification is a one-time notification due following start up of the source. The Permittee has completed this requirement. Therefore, the language will be removed from the draft permit.*
11. It is Plantation understanding the report referenced in this section was submitted as an attachment to the initial notification submitted to the Agency as required in 63.428(a) and therefore this report is not required (Section E.1.h.iii). *Agree. This Section further describes that this submittal should be an attachment to the notification required by 40 CFR 63.9(h). This notification is a one-time notification due noting initial compliance status. The Permittee has completed this requirement. Therefore, the language will be removed from the draft permit.*

date, 2011 – Draft permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Attachment	Insignificant Activities	-added two fire pumps with associated asterisked language of MACT, Subpart ZZZZ applicability
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3-4	Equipment table	-amended description of tanks (ID Nos. GN170, GN171, and GN172) to modify them from gasoline to distillate service and remove MACT Subpart R applicability -amended description of tank (ID No. GNCT-1) to modify it from gasoline to transmix service and remove MACT Subpart R applicability
5	2.1 A 2.1 A.1.a 2.1 A.1.b	-removed reference to tank (ID No. GNCT-1) -removed reference to tank (ID No. GNCT-1) -removed reference to tank (ID No. GNCT-1)
5-6	2.1 A.1.c	-updated shell language

Pages	Section	Description of Changes
6	2.1 B 2.1 B.1.b 2.1 B.1.d 2.1 B.1.e 2.1 B.1.f	-clarified applicable equipment descriptions -added ID numbers (removed tanks GN170, GN171 and GNCT-1) -added ID numbers (removed tanks GN170, GN171 and GNCT-1) -added ID numbers (removed tanks GN170, GN171 and GNCT-1) -added ID numbers (removed tanks GN170, GN171 and GNCT-1)
7	2.1 B.1.g 2.1 B.1.h 2.1 C (old) 2.1 C (new; table) 2.1 C.1.d	-added ID numbers (removed tanks GN170, GN171 and GNCT-1) -updated shell language -removed section and renumbered subsequent sections -added NSPS designation -updated shell language
9	2.1 D (new) 2.1 D (table)	-clarified applicable equipment descriptions -added MACT title and subpart designation
8-13	2.1 D.1.d-i	-added MACT detailed permit language
14-24	General Conditions	-updated shell conditions (v3.3)
25	List of Acronyms	-added acronyms for CAIR, NAA, and RACT

As part of this permit renewal, ESM was verified for completeness and agreement with the permit. The following changes were made as necessary:

1. two emergency fire pumps were added per the permit application. These sources are subject to the RICE MACT; and
2. two current tank descriptions have been modified to change their service from gasoline to distillates and remove MACT Subpart R applicability.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0524, New Source Performance Standards (409 CFR 60, Subpart K)

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

15A NCAC 2D .0927, Bulk Gasoline Terminals

15A NCAC 2D .0933, Petroleum Liquid Storage in External Floating Roof Tanks

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

15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

A regulatory review for these existing requirements will not be included in this document except to add detailed permit conditions for the MACT, Subpart R to include all cross referenced language. In addition, the Permittee and WSRO have identified two emergency fire pumps subject to the RICE MACT (40 CFR 63, Subpart ZZZZ; See Section VI of this Document for a Discussion).

As part of this permit renewal, the Permittee noted that with the modification of tanks (**ID Nos. GN170 and GN171**) from gasoline to distillate service, they should no longer be subject to the requirements of 15A NCAC 2D .0933, Petroleum Liquid Storage in External Floating Roof Tanks. As written, this rule applies to all external floating roof tanks with capacities greater than 950 barrels containing petroleum liquids whose true vapor pressure exceed 1.52 psia (10.48 kPa). The Permittee has provided a list of liquids currently being stored in these tanks as well as tanks (**ID Nos. GN172 and GNCT-1**). They are as follows:

From our Customer Manual

<i>Plantation Pipeline Product Code</i>	<i>Description</i>
53	Aviation Kerosene,
57	Aviation Kerosene, low sulfur
86	High Sulfur NRLM Diesel Fuel,
88	Heating Oil,
76	NRLM Diesel Fuel 500 ultra low sulfur

Therefore as part of this renewal, the reference to 15A NCAC 2D .0933 has been removed from the permit.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is currently subject to the New Source Performance Standards for three of its existing storage tanks (**ID Nos. GN153 through GN155**). The Permittee is required to equip these tanks with an internal floating type cover per 40 CFR 112(a) as well as the monitoring and recordkeeping activities per 40 CFR 60.113. This permit renewal does not affect this status.

NESHAPS/MACT/112j – The Permittee is currently subject to the Maximum Achievable Control Technology Standards for its existing storage tanks in gasoline service. The permit currently includes only references to the requirements in each of the paragraphs of this Subpart. The WSRO has requested that as part of this permit renewal, that detailed requirements be placed into the permit. Therefore, Section 2.1 E.1 has been modified to include the following language:

Note...MACT has been modified to include references only applicable to pipeline breakout stations that have fixed roofs with internal floating roofs as the control device option. In addition, applicability of the MACT is not in question; therefore, that Section of the MACT has also been removed. The compliance date has already passed for this MACT. The Permittee has not installed any new sources that must comply upon startup; therefore, references to compliance dates have also been removed. The remaining language includes only the current requirements for testing, monitoring, recordkeeping, and reporting. This was explicitly asked for by the WSRO as part of the permit renewal.

1. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. Plantation Pipe Line Company is “an existing” affected source. The pump station operations at this facility shall comply with all requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart R “National Emission Standards for Gasoline Distribution Facilities.”
- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.421 shall apply.

- c. The Permittee shall comply with the requirements of 40 CFR 63, Subpart A “General Provisions,” in accordance to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR 63, Subpart R.

40 CFR 63.423 - Standards: Storage vessels.

- d. Per 40 CFR 63.423(a), the Permittee shall equip each gasoline storage vessel with a fixed roof in combination with an internal floating roof according to the requirements in 40 CFR 60.112b (Subpart Kb) as follows:
- i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if these standards are exceeded.

40 CFR 63.424 - Standards: Equipment leaks.

- e. Per 40 CFR 63.424, the Permittee shall comply with the following requirements.
- i. The Permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable.
 - ii. A logbook shall be used and shall be signed by the Permittee at the completion of each inspection. A section of the logbook shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.
 - iii. Each detection of a liquid or vapor leak shall be recorded in the logbook. 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 in paragraph (e)(iv) below.
 - iv. Delay of repair of leaking equipment will be allowed upon a demonstration to the DAQ Regional Supervisor that repair within 15 days is not feasible. The Permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed.

- v. *As an alternative to compliance with the provisions in paragraphs (e)(i) through (iv) above, the Permittee may implement an instrument leak monitoring program that has been demonstrated to the Administrator, EPA Region IV as at least equivalent.*
- vi. *The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:*
 - A. *Minimize gasoline spills;*
 - B. *Clean up spills as expeditiously as practicable;*
 - C. *Cover all open gasoline containers with a gasketed seal when not in use;*
 - D. *Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.*

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if these standards are exceeded.

40 CFR 63.425 - Test methods and procedures.

- f. *Per 40 CFR 63.425(d), the Permittee shall comply with the requirements in 40 CFR 60.113b (Subpart Kb) as follows:*
 - i. *Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.*
 - ii. *For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the DAQ Regional Supervisor in the inspection report required in paragraph (h)(i)(B) below. 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.*
 - iii. *For vessels equipped with a double-seal system as specified in paragraph (d)(ii)(B) above:*
 - A. *Visually inspect the vessel as specified in paragraph (f)(iv) below at least every 5 years;*
or
 - B. *Visually inspect the vessel as specified in paragraph (f)(ii) above.*
 - iv. *Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (f)(ii) and (f)(iii)(B) above and at intervals no greater than 5 years in the case of vessels specified in paragraph (f)(iii)(A) above.*

- v. *Notify the DAQ Regional Supervisor in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (f)(i) and (f)(iv) above to afford the DAQ Regional Supervisor the opportunity to have an observer present. If the inspection required by paragraph (f)(iv) above is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the DAQ Regional Supervisor at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the DAQ Regional Supervisor at least 7 days prior to the refilling.*
- vi. *Per 40 CFR 63.426 the Permittee may request alternative means of emission limitations for storage vessels per the requirements in 40 CFR 60.114b (Subpart Kb). For determining the acceptability of alternative means of emission limitation for storage vessels, the following provisions apply:*
 - A. *If, in the Administrator, EPA Region IV's judgment, an alternative means of emission limitation will achieve a reduction in emissions at least equivalent to the reduction in emissions achieved by any requirement in paragraph (d) above, the Administrator, EPA Region IV will publish in the Federal Register a notice permitting the use of the alternative means for purposes of compliance with that requirement.*
 - B. *Any notice under paragraph (f)(vi)(A) above will be published only after notice and an opportunity for a hearing.*
 - C. *Any person seeking permission under this section shall submit to the Administrator, EPA Region IV a written application including:*
 - (i) *An actual emissions test that uses a full-sized or scale-model storage vessel that accurately collects and measures all VOC emissions from a given control device and that accurately simulates wind and accounts for other emission variables such as temperature and barometric pressure.*
 - (ii) *An engineering evaluation that the Administrator, EPA Region IV determines is an accurate method of determining equivalence.*
 - D. *The Administrator, EPA Region IV may condition the permission on requirements that may be necessary to ensure operation and maintenance to achieve the same emissions reduction as specified in paragraph (d) above.*

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if these test methods and procedures are not adhered to.

40 CFR 63.427 - Continuous monitoring.

- g. *Per 40 CFR 63.427(c), the Permittee shall comply with the monitoring requirements per 40 CFR 60.116b (Subpart Kb) as follows:*
 - i. *The Permittee shall keep copies of all records required by this paragraph, except for the record required by paragraph (g)(ii) below, for at least 5 years. The record required by paragraph (g)(ii) below will be kept for the life of the source.*
 - ii. *The Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.*
 - iii. *Except as provided in paragraph (g)(v) below, the Permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.*
 - iv. *Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.*

- A. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
- B. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - (i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference see 60.17), unless the DAQ Regional Supervisor specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - (ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
- C. For other liquids, the vapor pressure:
 - (i) May be obtained from standard reference texts, or
 - (ii) Determined by ASTM D287983, 96, or 97 (incorporated by reference see 60.17); or
 - (iii) Measured by an appropriate method approved by the Administrator, EPA Region IV;
 - or
 - (iv) Calculated by an appropriate method approved by the Administrator, EPA Region IV.
- v. The Permittee of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.
 - A. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in paragraph (g)(iv) above.
 - B. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in paragraph (d) above, an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - (i) ASTM D287983, 96, or 97 (incorporated by reference see 60.17); or
 - (ii) ASTM D32382 or 94 (incorporated by reference see 60.17); or
 - (iii) As measured by an appropriate method as approved by the Administrator, EPA Region IV.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if these monitoring requirements are not maintained.

40 CFR 63.428 - Reporting and Recordkeeping.

- h. Per 40 CFR 63.428(d), the Permittee shall keep records and furnish reports required by this section for at least 5 years per the requirements in 40 CFR 60.115b (Subpart Kb) as follows:
 - i. After installing the fixed roof and internal floating roof, the Permittee shall meet the following requirements:
 - A. Keep a record of each inspection performed as required by paragraphs (f)(i) through (iv) above. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

- B. *If any of the conditions described in paragraph (f)(ii) above are detected during the annual visual inspection required by paragraph (f)(ii) above, a report shall be furnished to the DAQ Regional Supervisor within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.*
- C. *After each inspection required by paragraph (f)(iii) above that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in paragraph (f)(iii)(B) above, a report shall be furnished to the DAQ Regional Supervisor within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of paragraphs (d)(i) through (iii) or (f)(i) above and list each repair made.*
- ii. *The Permittee shall record the following information in the logbook for each leak that is detected:*
 - A. *The equipment type and identification number;*
 - B. *The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);*
 - C. *The date the leak was detected and the date of each attempt to repair the leak;*
 - D. *Repair methods applied in each attempt to repair the leak;*
 - E. *“Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;*
 - F. *The expected date of successful repair of the leak if the leak is not repaired within 15 days; and*
 - G. *The date of successful repair of the leak.*
- iii. *The Permittee shall include in a semiannual report to the DAQ Regional Supervisor the number of equipment leaks not repaired within 5 days after detection.*
- iv. *The Permittee shall submit an excess emissions report to the DAQ Regional Supervisor in accordance with §63.10(e)(3), whether or not a CMS is installed at the facility. Equipment leaks for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection are excess emissions events under this subpart, and the following information shall be included in the excess emissions report, as applicable:*
 - A. *The date on which the leak was detected;*
 - B. *The date of each attempt to repair the leak;*
 - C. *The reasons for the delay of repair; and*
 - D. *The date of successful repair.*
- v. *The Permittee shall perform the following requirements, all of which will be available for public inspection:*
 - A. *Document and report the methods, procedures, and assumptions supporting the calculations for determining criteria in §63.420(c);*
 - B. *Maintain records to document that the facility parameters established under §63.420(c) have not been exceeded; and*
 - C. *Report annually to the DAQ Regional Supervisor that the facility parameters established under §63.420(c) have not been exceeded.*
 - D. *At any time following the notification required under paragraph (h)(v)(A) above and approval by the DAQ Regional Supervisor of the facility parameters, and prior to any of the parameters being exceeded, the Permittee may submit a report to request modification of any facility parameter to the DAQ Regional Supervisor for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.*
- vi. *The Permittee shall perform the following requirements, all of which will be available for public inspection:*

- A. Document and report the use of the emission screening equations in §63.420(b)(1) and the calculated value of E_P ;
 - B. Maintain a record of the calculations in §63.420(b)(1), including methods, procedures, and assumptions supporting the calculations for determining criteria in §63.420(d); and
 - C. At any time following the notification required under paragraph (h)(vi)(A) above, and prior to any of the parameters being exceeded, the Permittee may notify the DAQ Regional Supervisor of modifications to the facility parameters. Each such notification shall document any expected HAP emission change resulting from the change in parameter.
- i. In addition to any other reporting, the Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

As part of this permit renewal, the Permittee and WSRO have indicated that the Permittee operates two diesel-fired emergency fire pumps (208 and 238 Hp, respectively). These sources need to be added to the list of insignificant sources and applicability to the recently modified MACT for Stationary Reciprocating Internal Combustion Engines (RICE) must be determined. According to the latest EPA spreadsheet summary, the following requirements are applicable to these existing, emergency compression ignition, less than 500 Hp sources located at a major source of HAP emissions:

Date constructed – Before **June 12, 2006**

Compliance date – **May 3, 2013**

Emission Limitations – 63.6602 (Table 2c)

- change oil and filter every 500 hours of operation or annually whichever comes first,
- inspect air cleaner every 1,000 hours of operation or annually, whichever comes first,
- inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
- minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

Operating Limitations – NA

Fuel Requirements – NA

Performance Tests – NA

Monitoring/Installation/Collection/Operation/Maintenance Requirements – 63.6625(e), (f), (h), and (i)

Initial Compliance – NA

Continuous Compliance – 63.6605 and 63.6640

Notification Requirements – NA

Recordkeeping Requirements – 63.6655 (except 63.6655(c))

Reporting Requirements – 63.6650 (except 63.6655(g))

General Provisions – Yes

To address the cases where current insignificant activities subject to a MACT or GACT now have to be acknowledged in the permit as being applicable to the respective subpart, DAQ has created a new web page titled "Regulatory Guide for Insignificant / Permit Exempt Activities." The link to this site is as follows:

<http://daq.state.nc.us/permits/insig/>

Asterisked language, including this link, has been added to the insignificant activities table of the renewed permit. Once the Permittee accesses this link he will be able to get the regulatory guide for the subject MACT/GACT, NSPS, and/or NCAC affected sources (in this case, the emergency generator).

PSD – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

112(r) – The 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. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no permitted control devices at this facility; therefore, CAM is not applicable.

VII. Facility Wide Air Toxics

The Permittee is not currently subject to any NC Air Toxics requirements. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2008 Actual Emissions (tpy)	2009 Actual Emissions (tpy)
VOC	94.48	57.39
Total HAP/TAP	3.26	1.95

IX. Stipulation Review

The facility was last inspected by Jennifer White of the WSRO on August 12, 2010. At the time of her inspection, the facility “appeared to be in compliance with applicable air quality regulations.” She did note the following:

1. Tanks GN170 and GN171 (external floating roof tanks) are in distillate service and have been for many years. The permit currently lists these tanks as having the capability to store gasoline. The facility does not wish to store gasoline in these tanks as additional maintenance and upgrades to the roof would be required. Since the facility expects to maintain distillate only in these tanks, they have submitted a request to change the emission source description in the permit to be exclusively distillate storage tanks. When this change is made, the indication that they are MACT subject should also be removed. *Agree, these sources have been modified as requested by the Permittee and noted by the regional inspector.*
2. The two fire water pumps should be added to the insignificant activities list with a notation that they are subject to the RICE MACT (40 CFR 63, Subpart ZZZZ). *Agree, these sources have been added as requested by the Permittee and noted by the regional inspector.*
3. The general condition associated with fugitive dust and 2D .0540 should be added in the next permit revision. *Agree, the General Conditions have been updated to the most recent shell conditions (v3.3) including fugitive dust.*

In her comments on the renewal application, Ms. White also noted that the MACT Subpart R requirements are not detailed (only include specific CFR references); however, the facility has already established systems (LDAR and maintenance) to comply. Further details may aide in future compliance inspections. *Agree, specific detailed permit conditions have been added to the renewed permit as discussed above (see Section VI of this Document).*

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of Virginia and The Forsyth County Local Program are each affected areas within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WSRO's recommendation to issue the renewed air permit.