

Facility Name: **Global Companies – Doraville Terminal**
City: Doraville
County: DeKalb
AIRS #: 04-13-089-00131

Application #: TV-807921
Date Application Received: December 22, 2023
Permit No: 5171-089-0131-V-06-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Global Companies – Doraville Terminal

2. Parent/Holding Company Name

Global Companies LLC

3. Previous and/or Other Name(s)

Motiva Enterprises LLC

4. Facility Location

4127 Winters Chapel Road
Doraville, Georgia 30360 (DeKalb County)

4143 Winters Chapel Road
Doraville, Georgia 30360 (DeKalb County)

4201 Winters Chapel Road
Doraville, Georgia 30360 (DeKalb County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
5171-089-0131-V-05-0	January 24, 2024	Administrative Permit Amendment – Name and Ownership Change.

D. Process Description

1. SIC Codes(s)

5171 – Petroleum Product Distribution Bulk Terminal

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Bulk Petroleum Terminal and Petroleum Products storage, distribution and ethanol and additive blending.

3. Overall Facility Process Description

Gasoline and diesel fuel are received via shipments through a pipeline. Ethanol is received by railcar. Gasoline, ethanol, and diesel receipts are diverted into above ground storage tanks. Fuel additives, which are received via tanker truck are routed to additive tanks. There are three loading racks, which are called east, west, and south loading racks. The gasoline, ethanol, diesel fuel, and additives are pumped to east, west, and south loading racks which are equipped with vapor combustion units (VCU1 and VCU2) control devices. The South Unit is also equipped with a Vapor Recovery Unit (VRU1) which is the primary vapor control device for the South Loading Rack.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Total tank storage at this facility is approximately 26 million gallons which is equal to about 640,000 barrels. PSD regulations name petroleum storage facilities with total capacities of greater than 300,000 barrels as one of the 28 named categories of sources whose annual emissions make them a PSD major source if they exceed 100 tons. However, since Global is limited below this threshold, it would not be considered a major source for PSD purposes. Potential annual emissions of VOCs from this source have been calculated to be 114.48 tons.

These calculations were made using the permitted emission rate for the terminal of 10 mg/liter of gasoline loaded with a maximum annual throughput of gasoline and ethanol to 650,000,000 gallons and the throughput of distillate to 398,160,000 gallons. This facility is not considered a major source under PSD regulations.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	n/a			✓
PM ₁₀	n/a			✓
PM _{2.5}	n/a			✓
SO ₂	n/a			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	n/a			✓
H ₂ S	n/a			✓
Individual HAP	✓		✓	
Total HAPs	✓		✓	

3. MACT Standards

Global Companies has permit limits in their Title V permit to make them a synthetic minor source for HAPs. These conditions include a limit as not to exceed 10 milligrams of total organic compounds per liter of gasoline loaded (0.0835 lb. of total organic compounds per 1,000 gallons) and the control efficiency of the vapor control system shall be maintained at no less than 90 percent, during the transfer of gasoline. Global Companies is also limited to an annual throughput of gasoline and ethanol to 650,000,000 gallons and the throughput of distillate to 398,160,000 gallons.

NESHAP Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station), applies to bulk gasoline terminals that are a major source of HAP or have a calculated emissions screening factor (determined using equation per 40 CFR 63.420(a)(1)) greater than 1.

NESHAP Subpart R does not apply because this facility is minor for HAPs (individual and total HAPs). The estimated actual emissions of total HAPs at their allowable throughput are 9.1 tons per year and no individual HAP is potentially emitted at a rate of more than 5.5 tons per year. The major source thresholds for total and individual HAPs are 25 and 10 tons per year respectively.

The facility is subject to 40 CFR 63 Subpart BBBBBB, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Global Companies has a facility wide limit as not to discharge or cause the discharge into the atmosphere any single hazardous air pollutant (HAP) listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons (or any lesser quantity for a single hazardous air pollutant that EPA may establish by regulation) during any 12 consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any 12 consecutive months. This condition is to avoid 40 CFR 63 Subpart R and 391-3-1-.02(9)(b)32. This will ensure the facility is a minor source for HAPs and therefore, makes 40 CFR 63 Subpart R inapplicable to Global's Doraville Terminal.

B. Applicable Rules and Regulations

Global Companies LLC – Doraville Terminal is not subject to any facility wide air quality rules other than the general provisions in Part 8.0 of the permit and the general provisions contained in Rule 391-3-1-.02(2)(a) and the general gasoline volatility rule which applies to the entire metro Atlanta ozone non-attainment area.

C. Compliance Status

Global Companies LLC – Doraville Terminal did not list any issues of non-compliance nor submit a Compliance Plan for Non-Compliance Emission Unit or Group in the Title V Permit Application.

D. Permit Conditions

Condition 2.1.1 is the HAPs Synthetic Minor Limit Permit Condition. It is also a NESHAP Subpart R avoidance Condition.

Condition 2.2.1 requires continued compliance with those provisions of NESHAP 40 CFR 63 Subpart R that ensure continued non-applicability of this NESHAP to the facility.

Condition 2.2.2 requires compliance with all applicable provisions of 40 CFR 63 Subpart A “General Provisions” as per Table 3 of the NESHAP for *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (40 CFR 63 Subpart BBBBBB)*.

Condition 2.2.3 requires compliance with all applicable provisions of 40 CFR 60 Subpart A “General Provisions” as specified in 40 CFR 60 Subpart K and Kb.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
1	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal
2	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal
4	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
11	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal
12	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 60, Subpart Kb		Mechanical shoe primary seal Rim-mounted secondary seal
13	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Vapor-mounted primary seal Rim-mounted secondary seal
14	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Vapor-mounted primary seal Rim-mounted secondary seal
15	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
25599	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
25601	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
25602	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal
31511	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
31723	Internal Floating Roof Tank	391-3-1-.02(2)(bb) 40 CFR 60, Subpart K 40 CFR 63, Subpart BBBBBB		Mechanical shoe primary seal Rim-mounted secondary seal
SR	South Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 60, Subpart XX 40 CFR 63, Subpart BBBBBB	VRU1	Vapor Recovery Unit (VRU) APC-3

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
			VCU1	Vapor Combustion Unit (VCU) APC-1
WER	West and East Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 60, Subpart XX 40 CFR 63, Subpart BBBBBB	VCU2	APC-2 - Vapor Combustion Unit (flare)

B. Equipment & Rule Applicability

Rules and Regulations Assessment: Following is an overview of the specific rules and regulations that apply to this facility.

Georgia Rule (bb) applies to tanks 1, 2, 4, 11, 12, 13, 14, 15, 25599, 25601, 25602, 31511, and 31723 since they have capacities of more than 40,000 gallons and are capable of storing a product with a vapor pressure of greater than 1.52 psia (i.e. they are equipped with floating roofs). Rule (bb) requires that these tanks be equipped with floating roofs. Other tanks at this facility which have volumes of greater than 40,000 gallons, have only fixed roofs and may not store the volatile products that would subject them to this Rule. Tanks 25599 and 25601 are formerly external floating roof tanks which have been equipped with geodesic domes, making them internal floaters and subject to Rule (bb) instead of Rule (nn).

Georgia Rule (cc) applies to all gasoline terminals in the State and covers the terminal or loading rack portion of this facility. Gasoline terminal is defined in the Rule as a facility, which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Global meets all of these criteria and must therefore, have a control system with an efficiency of at least 90 percent. Although this Rule also mandates a maximum emission rate of no more than 80 milligrams per liter of gasoline loaded at the terminals, this emission limit is superseded by the 35 milligrams per liter standard of the NSPS regulation at the west loading rack. However, this limit in turn is superseded by the 10 milligrams per liter limit the facility has voluntarily taken as a MACT avoidance condition for both of the gasoline loading racks.

Georgia Rule (ss) applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is Global's primary business at this facility. Global must take steps to ensure that they only load gasoline into tanker trucks that have passed a vapor tightness test to ensure that they do not leak. This Rule is also automatically applicable to any facility that is subject to Rule (cc).

40 CFR 60, Subpart XX, applies to any gasoline terminal constructed or modified after December 17, 1980. Since the West loading rack is the only rack that was modified after this date, Global must meet the emission limit for this regulation of 35 milligrams (of VOCs) per liter of gasoline loaded (although they have voluntarily taken a stricter limit of 10 mg/liter).

In addition to the emission limit, this regulation requires certain equipment standards to ensure a vapor tight loading system and requires that the terminal only load gasoline into tanks that have been tested and shown to be vapor tight. Record keeping and ensuring compliance with these requirements is also required. The South Rack has not been modified since December 17, 1980, and thus not subject to Subpart XX.

40 CFR 60 Subpart K applies to storage vessels of petroleum liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978. Specifically, Tank 31723 meets this requirement.

40 CFR 60, Subpart Kb, is a federal standard of performance for petroleum storage vessels constructed after July 23, 1984, that have storage capacities of greater than 40 cubic meters (about 10,000 gallons). Tank 12 meets this requirement. In addition, the gasoline the facility is storing does not meet the maximum vapor pressure values for exemption from this rule. This tank must have the following equipment:

- i. The internal floating roof must rest on the stored liquid at all times except during the brief times when the tank is completely emptied.
- ii. The internal floating roof must have either a foam - or a liquid mounted liquid-filled seal, a double seal, or a mechanical shoe seal.
- 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.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with gaskets and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. These sample wells shall have slit fabric covers that cover at least 90 percent of their openings.
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

40 CFR 63 Subpart BBBBBB, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*, applies to Global Companies - Doraville Sales Terminal since it is a bulk gasoline terminal that is not subject to 40 CFR 63, Subpart R. Subpart R covers major sources of HAPs. Subpart BBBBBB covers sources that are minor sources of HAPs. Subpart BBBBBB was first published on January 10, 2008, and was amended on January 24, 2011. This subpart incorporates similar requirements to NSPS Subparts Kb and XX, Georgia Rule (ss), and institutes a monthly leak inspection program.

C. Permit Conditions

Condition 3.2.1 pertains to a limitation to keep the facility a synthetic minor for HAPs, thus avoiding the applicability of the gasoline MACT standard 40 CFR 63 Subpart R.

Condition 3.2.2 requires a 90 percent control efficiency for the vapor control system, is required by Rule (cc). It also limits emissions from the vapor control system to 10 milligrams per liter of gasoline loaded.

Condition 3.2.3 states that at the South Rack VRU1 is the primary control device and the VCU1 is the secondary/backup control device. Gasoline loading shall not occur at the South rack if both control devices are inoperable.

Condition 3.3.1 requires tank 31723 to comply with 40 CFR 60 Subpart K “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978”.

Condition 3.3.2 pertains to 40 CFR Subpart XX Standards of Performance for Bulk Gasoline Terminals.

Condition 3.3.3 ensures the Permittee will comply with the applicable provisions for internal floating roofs, which is part of 40 CFR 60, Subpart Kb.

Condition 3.3.4 requires the Permittee to maintain all openings in a closed position, except when in use, for a fixed roof tank.

Condition 3.3.5 pertains to the seal requirements of 40 CFR 63, Subpart BBBBBB for internal floating roof tanks.

Condition 3.3.6 pertains to the 40 CFR 63, Subpart BBBBBB requirements for gasoline tank trucks loading at subject terminals.

Condition 3.3.7 requires the terminal is only allowed to load vapor tight truck as per 40 CFR 63, Subpart BBBBBB requirements.

Condition 3.3.8 ensures the Permittee regulates the gauge pressure of the truck loading system at the terminal as per 40 CFR 63, Subpart BBBBBB.

Condition 3.4.1 states large tanks with a true vapor pressure greater than 1.52 psia must have a control device or a floating roof.

Condition 3.4.2 pertain to Georgia Rule 391-3-1-.02(2)(cc) "Bulk Gasoline Terminals".

Condition 3.4.3 requires the Permittee to comply with 391-3-1-.02(2)(ss) "Gasoline Transport Vehicle and Vapor Collection Systems".

Condition 3.4.4 requires the Permittee to paint the tanks in order to reduce the amount of radiant solar energy transferred to the tank, which raises the operating temperature.

Condition 3.5.1 ensures routine maintenance on all air pollution control equipment.

Condition 3.5.2 requires the Permittee to keep spare parts inventory for the control equipment.

Condition 3.5.3 states the Permittee shall not load at the rack if the flare is not operating.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires when performance tests are conducted for the vapor control equipment in the future, they be conducted to establish a monitoring operating value. This Condition pertains to the provisions of 40 CFR 63 Subpart BBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

Condition 4.2.2 is a one-time test requirement for the Vapor Recovery Unit and has been complied with the testing of the VRU in November 2020. Therefore, this condition is not included in the renewal Title V permit for the General's Doraville Station.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Monitoring requirements specified in Permit No. 5171-089-0131-V-05-0 are being carried over for this permit renewal. The provisions of 40 CFR 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities represent a large number of the monitoring requirements.

Condition 5.2.1 ensures there is a device to continuously indicate the presence of a flame at the vapor combustor units (VCU1 and VCU2). This condition includes the requirements for when the vapor combustor unit (VCU1) is in operation as backup for the vapor recovery unit (VRU1) at the South rack.

Condition 5.2.2 requires a pressure measurement device on each vapor collection systems capable of measuring up to 500 mm of water gauge pressure.

C. Compliance Assurance Monitoring (CAM)

Each emission unit controlled by a control device that "has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source," as defined by 40 CFR 64.2(a)(3) is subject to CAM. Specifically, the following pollutant specific emission units (PSEU) were found to be subject to the Compliance Assurance Monitoring:

Emission Unit	Pollutant
APC1 South Rack Vapor Collection System	VOC
APC2 West and East Racks Vapor Collection System	VOC

Conditions 5.2.3 and 5.2.4 include the CAM requirements for the emissions unit listed in Section 3.1 which is equipped with a CAM subject "control device," as defined by 40 CFR 64.1.

Global Companies – Doraville Terminal operates two gasoline loading racks, which could be considered *pollutant specific emission units* (PSEUs) per Part 64 because they are (1) subject to a pollutant emission standard for which there is a control device, and (2) the pre-controlled potential emission for the pollutant is greater than the major source threshold.

Global Companies will continuously monitor the presence of a flame in their vapor combustors as the primary indicator of compliance. Monitoring of system pressure will be the secondary indicator. EPD agrees with the proposed terms specified in the CAM plan and makes the performance criteria permit

Conditions 5.2.3 and 5.2.4 of the proposed renewed Permit. The monitoring of flame presence and vapor system collection pressure are already required by Conditions 5.2.1 and 5.2.2, respectively. Condition 5.2.5 pertains to the Permittee maintaining records of the maximum true vapor pressure of liquid stored in Tank 12.

Condition 5.2.6 states the Permittee must do an inspection every 12 months after initial fill for Tank 12.

Condition 5.2.7 requires the Permittee to inspect each time a Tank 12 is emptied and degassed, but no less than once every 10 years.

Condition 5.2.8 pertains to Permittee visually inspecting the internal floating roofs and the primary seals or the secondary seals (if one is in service) through manholes and roof hatches on the fixed roof except for Tank 12, at least once every 12 months after initial fill.

Condition 5.2.9 includes a procedure for defects pertaining to the internal floating roof except for Tank 12. It also states the Permittee shall notify the Division in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by this condition to afford the Division the opportunity to have an observer present.

Condition 5.2.10 requires the Permittee to perform a monthly leak inspection of all equipment in gasoline service and the results kept in a logbook.

Condition 5.2.11 pertains to visually inspecting double-seal system tanks at least every 5 years except for Tank 12.

Condition 5.2.12 ensures the Permittee shall install, calibrate, operate, and maintain, according to manufacturer's instructions, an interlock control system at each terminal.

Condition 5.2.13 requires the facility to install, operate, and maintain an interlock system to prevent gasoline loading operations when proper conditions are not met.

Condition 5.2.14 requires the facility to install a device to continuously track the vapor staging valves position as part of interlock system.

Condition 5.2.15 requires the facility to install a continuous emissions monitoring system, CEMS, to monitor the average hydrocarbon concentration at the exit of the VRU1.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7 includes reportable excess emissions, exceedances and excursions.

Condition 6.1.8 has been removed because the emissions statement requirement was removed from the Georgia Rules.

Condition 6.2.1 states the information to be recorded for each leak that is detected during the monthly leak inspections. This condition requires the Permittee to keep record of any shutdowns, malfunctions, and subsequent maintenance on the vapor control system including the VRU at the South Rack.

Conditions 6.2.2 requires the Permittee to keep records of the timing and steps taken to fix leaks or perform maintenance on the vapor collection, processing systems, and monitoring systems. It also explains what information is needed if there is a delay in the repairs.

Condition 6.2.3 pertains to the Permittee keeping records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

Condition 6.2.4 requires the Permittee to maintain a daily log of all petroleum liquid and ethanol throughput for the tank truck loading racks.

Condition 6.2.5 pertains to documenting the gasoline tank truck vapor tightness.

Condition 6.2.6 pertains to the dimensions and volatile organic liquid stored in Tank 12.

Condition 6.2.7 states the Permittee shall repair vessels within 45 days or request an extension from the Director.

Condition 6.2.8 requires Global to keep a record of each inspection performed and 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).

Condition 6.2.9 states the Permittee furnish the Director a report within 30 days of detecting a failure during the visual inspections.

Condition 6.2.10 requires a notification be sent to the Director at least 30 days prior to filling or refilling each storage vessel.

Condition 6.2.11 pertains to keeping records of each inspection performed on Tank 12.

Condition 6.2.12 requires a report be furnished to the Director within 30 days of the inspection if any failures are detected by the visual inspection or holes or tears in the seal or fabric or defects in the internal floating roof are detected during the inspections.

Condition 6.2.13 requires the Permittee to prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service.

Condition 6.2.14 requires the Permittee to keep records of the test results for each gasoline cargo tank loading at the facility.

Condition 6.2.15 requires the Permittee to report 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.

Condition 6.2.16 was not included in the renewal permit since this one-time requirement has been met.

VII. Specific Requirements

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit.

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.