

Facility Name: **Colonial Pipeline Company – Atlanta Junction**
 City: Austell
 County: Cobb
 AIRS #: 04-13-067-00074

Application #: TV-627414
 Date Application Received: January 24, 2022
 Permit No: 4613-067-0074-V-05-0

| Program | Review Engineers | Review Managers |
|-----------------------------------|-------------------------|------------------------|
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| Permitting Program Manager | | Stephen Damaske |

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: Colonial Pipeline Company – Atlanta Junction
2. Parent/Holding Company Name: Colonial Pipeline Company
3. Previous and/or Other Name(s): None
4. Facility Location

Facility Location: 3925 Anderson Farm Road
Austell, GA 30106

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

This facility is located in an area designated as non-attainment for ozone

B. Site Determination

There are no applicable issues with regard to the site determination. There are no other facilities which could be considered 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 |
|--|--------------------------------|---|
| 4613-067-0074-V-4-0 | August 3, 2017 | 3 rd Title V permit renewal |
| Off-Permit-Change | May 3, 2022 | Including cooling towers and unpaved roads to permit. |

D. Process Description

1. SIC Codes(s): 4613 (Refined Petroleum Pipelines)

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)

Colonial Pipeline Company – Atlanta Junction operates a pipeline breakout facility for refined petroleum products.

3. Overall Facility Process Description

Colonial Pipeline Company operates Atlanta Junction, a pipeline breakout facility located in Austell, Georgia. The facility emission sources consist of eighteen (18) internal floating roof tanks in gasoline service and fifteen (15) tanks in distillate service (jet kerosene, diesel fuel and No. 2 fuel oil). Of the fifteen tanks in distillate service, ten (10) are fixed roof, one (1) is an external floating roof, and four (4) are internal floating roof tanks. The facility receives petroleum products by pipeline and ships out product by pipeline to bulk gasoline terminals and regional distribution plants in Georgia and Tennessee. Volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions result primarily from the refined petroleum product tanks and fugitive emissions from piping components such as valves, pumps, and flanges. The facility's operating schedule is 24 hours per day and 7 days per week.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility is currently classified as a major source of VOC in the ozone nonattainment area. For major sources, permitting actions are subject to review according to the nonattainment area new source review (NAA/NSR) provisions if the VOC or NO_x emissions increase from a modification itself is greater than the major source modification threshold of 25 tons per year.

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 | | | | |
| PM ₁₀ | | | | |
| PM _{2.5} | | | | |
| SO ₂ | | | | |

| 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 |
| VOC | ✓ | ✓ | | |
| NO _x | | | | |
| CO | | | | |
| TRS | | | | |
| H ₂ S | | | | |
| Individual HAP | ✓ | | | ✓ |
| Total HAPs | ✓ | | | ✓ |

3. MACT Standards

AS a synthetic minor source, the potential individual and total HAP emissions from this facility are less than 10 and 25 tons per year respectively. However, applicability for 40 CFR Part 63, Subpart R, “*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*” is determined by calculating an emission screening factor (E_T) for each facility. If the value of E_T is less than 1, then the facility is not subject to 40 CFR Part 63, Subpart R. The E_T for this facility was calculated to be less than 1, therefore, NESHAP Subpart R is not applicable to this facility. Consequently, this 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 | No |
| Program Code M – Part 63 NESHAP | Yes |
| Program Code V – Title V | Yes |

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility is limited not to discharge or cause the discharge into the atmosphere any single hazardous air pollutant (HAP) in an amount equal to or exceeding 10 tons during any 12 consecutive months, or any combination of such HAPs in an amount equal to or exceeding 25 tons during any 12 consecutive months. The application shows that the actual HAP emissions from the facility are less than the 10/25 ton per year major source thresholds. As a minor source for HAP emissions, the facility will not be subject to 40 CFR 63 Subpart R, “*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station)*.”

B. Applicable Rules and Regulations

Facility-wide air quality applicable rules include the requirements of 40 CFR 63, “*National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A*”, and the general provisions contained in Georgia Rule 391-3-1-.02(2)(a) which are cited, chiefly, in Section VIII 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.

To ensure non-applicability with 40 CFR Part 63, Subpart R, “*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*”, Colonial Pipeline chose limits to keep emissions of either any single HAP below 10 tons or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any 12 consecutive months.

C. Compliance Status

The facility is operating in compliance with the rules and regulations.

D. Permit Conditions

Permit conditions from the current Title V Permit No. 4163-067-0074-V-04-0 (this permit has no amendments) are carried over into this draft Title V permit renewal without any changes.

Condition 2.2.1 was carried over from the current Title V permit No. 4163-067-0074-V-04-0. This establishes a facility wide 10/25 ton per year HAP limit for individual and total HAPs. This condition ensures that the facility remains a minor source for HAP emissions for avoidance of 40 CFR 63 Subpart R.

Condition 2.2.2 was carried over from the current Title V permit No. 4163-067-0074-V-04-0. This condition requires all emission units subject to 40 CFR Part 63, Subpart BBBBBB to comply with the applicable requirements under Subpart BBBBBB, as incorporated by conditions in this draft permit.

Condition 2.2.3 has been added to establishes the applicability of Subpart A - “*General Provisions*” of 40 CFR 63 – “*National Emission Standards for Hazardous Air Pollutants for Source Categories*” to the facility.

III. Regulated Equipment Requirements

A. Equipment List for the Process

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|----------------|---|---|-------------------------------|------------------------|
| ID No. | Description | | ID No. | Description |
| GTG | Gasoline Storage Tanks 310, 311, 312, 313, 314, 315, 316, 317, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339 | 391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBB | N/A | Internal Floating Roof |

B. Equipment & Rule Applicability

Colonial Pipeline Company – Atlanta Junction must not store petroleum liquid with a true vapor pressure of 1.5 psia or greater in Tank 351 as required by 40 CFR 63, Subpart BBBB avoidance.

Georgia Rule (bb), “*Petroleum Liquid Storage*”, applies to tanks in Group GST1 (Gasoline Storage Tanks 310, 311, 312, 313, 314, 315, 316, 317, 330, 331, 332, 333, 334, 335, 336, 337, 338 and 339) since each of these tanks has a capacity of more than 40,000 gallons and is capable of storing a product with a vapor pressure of greater than 1.52 psia (i.e. they are equipped with internal floating roofs). See Condition 3.4.2.

The current permit contains conditions meant to assure continued exemption from the provisions of 40 CFR 63 Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

40 CFR 63 Subpart BBBB, “*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*”, applies only to equipment or storage tanks in gasoline service. NESHAP Subpart BBBB regulates sources that are minor sources of HAPs emissions. NESHAP Subpart BBBB 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

Permit conditions from the current Title V Permit No. 4163-067-0074-V-04-0 (this permit has no amendments) are carried over into this draft Title V permit renewal without any changes.

Condition 3.2.1 contain an operating limit to allow Tank 351 to avoid being subject to NESHAP Subpart BBBB.

Condition 3.3.1 contain applicable structural and operating requirements for internal floating tanks subject to NESHAP Subpart BBBB. Updated to include double seals for control technology.

Condition 3.3.2 contain applicable structural and operating requirements under NESHAP Subpart BBBB for tanks with a capacity of less than 75 m³ (19,812 gallons).

Condition 3.4.1 contains the structural requirement for above-ground tanks with a capacity of 40,000 gallons or greater used to store a petroleum liquid with a true vapor pressure of 1.5 psia or greater under Rule (a).

Condition 3.4.2 contains the structural requirements for each tank with a capacity of 40,000 gallons or greater, storing a product with a true vapor pressure of greater than 1.52 psia under Rule (bb).

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

Not applicable.

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

Conditions 5.2.1, 5.2.2, 5.2.3 and 5.2.4 were all carried over from the current Title V permit No. 4613-067-0074-V-04-0 without change. These existing conditions incorporate applicable monitoring/inspection requirements for storage tanks under NESHAP Subpart BBBBBB.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

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

Conditions 6.2.1 thru 6.2.6 were all carried over from the current Title V permit No. 4613-067-0074-V-04-0 without change.

Conditions 6.2.1 and 6.22 incorporate the applicable production recordkeeping requirements under NESHAP Subpart R and ensure the compliance with Condition 2.1.1. Conditions 6.2.1, 6.2.2 and 6.2.3 contain the applicable recordkeeping requirements under HESHAP Subpart BBBB.

VII. Specific Requirements**A. Operational Flexibility**

Subpart BBBBBB allows for different methods of compliance for internal floating roof tanks as shown in Table 1 of the regulation. Subject facilities with these tanks may install a closed vent system with a 95 percent efficient control device or meet 40 CFR 60, Subpart Kb requirements (with some changes) or comply with 40 CFR 63, Subpart WW. The regulations require the subject facility to pick a compliance method and Colonial has opted to meet the Kb-like requirements. Colonial could switch to an alternative method of compliance however, a permit would be required.

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

The facility is operating in compliance with all rules and regulations listed above.

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

None

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.//