

Facility Name: **MPLX Terminals, LLC - Doraville Terminal**
 City: Doraville
 County: DeKalb
 AIRS #: 04-13-089-000120

Application #: TV-622511
 Date Application Received: January 18, 2022
 Permit No: 5171-089-0120-V-05-0

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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: MPLX Terminals, LLC - Doraville Terminal
2. Parent/Holding Company Name: MPLX Terminals, LLC
3. Previous and/or Other Name(s)

This facility was originally permitted in 1979, under the name Marathon Oil Company. In January of 1998, the name changed to Marathon Ashland Petroleum LLC and then in 2005 became Marathon Petroleum Company LLC. In 2010 the name of the facility was changed again to Marathon Petroleum Company LP. The facility's name changed to the current name via issuance of Title V operating permit No. 5171-089-0120-V-04-0 on May 31, 2016

4. Facility Location

6293 New Peachtree Road, Doraville, Georgia (DeKalb County)

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

The terminal is located within the Atlanta ozone NAA and the Atlanta PM_{2.5} Maintenance area (re-designated on February 24, 2016) and is therefore subject to NAA NSR permitting requirements for ozone (ozone plus precursors NO_x and VOC) and PM_{2.5} (PM_{2.5} plus precursors of NO_x and SO₂). For all other criteria pollutants, the terminal is potentially subject to the Prevention of Significant Deterioration (PSD) permitting requirements.

The terminal is located in an area currently considered a Moderate NAA with regard to the 2008 8-Hour Ozone standard. Per 40 CFR 52.21 (b)(1)(i)(c)(iii), the terminal is not considered to be one of the 28 source categories that must account for fugitive emissions in its Major Source status. Facility-wide potential point source VOC emissions do not exceed the 100 tpy NSR Major Source Threshold; therefore, the terminal should be considered a Minor Source for ozone under the NSR permitting program. For all other pollutants, the applicable Major Source threshold pursuant to the PSD program is 250 tpy. For purposes of PSD, the source is minor for all applicable 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
5171-089-0120-V-05-0	07/20/2017	Title V Permit Renewal

D. Process Description

1. SIC Codes(s)

5171: Petroleum Bulk Stations and Terminals

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)

The products handled by this facility include gasoline, distillate oil, ethanol and additives to gasoline and distillate oil.

3. Overall Facility Process Description

This facility is a bulk gasoline terminal, which receives product by underground pipeline, stores them in storage tanks and dispenses it through loading rack to trucks where it is delivered to gasoline dispensing facilities (gas stations) and bulk gasoline plants. Emissions from the transfer of gasoline at the loading rack are controlled with a vapor recovery unit (VRU). There are seven large storage tanks at this facility, which store petroleum products. Three of these tanks are equipped with internal floating roofs, three are equipped with floating roofs and geodesic domes and one has a vertical fixed roof. The floating roof tanks typically stores gasoline, however they could also store other petroleum products or ethanol. There are three additive (less than 10,000 gallon capacity) tanks at this facility as well as a 14,532 gallon transmix tank. *The facility is also permitted to construct and operate 10 vertical fixed roof tanks, which can receive, store and dispense ethanol.* The loading rack can receive and blend ethanol. The facility can also load ethanol into tanker trucks.

4. Overall Process Flow Diagram

There is no change to the existing process flow and a PFD was not provided with the renewal permit application.

E. Regulatory Status

1. PSD/NSR

The terminal is located within the Atlanta ozone NAA and the Atlanta PM_{2.5} Maintenance area (re-designated on February 24, 2016) and is therefore subject to NAA NSR permitting requirements for ozone (ozone plus precursors NO_x and VOC) and PM_{2.5} (PM_{2.5} plus precursors of NO_x and SO₂). For all other criteria pollutants, the terminal is potentially subject to the Prevention of Significant Deterioration (PSD) permitting requirements.

The terminal is located in an area currently considered a Moderate NAA with regard to the 2008 8-Hour Ozone standard. Per 40 CFR 52.21 (b)(1)(i)(c)(iii), the terminal is not considered to be one of the 28 source categories that must account for fugitive emissions in its Major Source status. Facility-wide potential point source VOC emissions do not exceed the 100 tpy NSR Major Source Threshold; therefore, the terminal should be considered a Minor Source for ozone under the NSR permitting program. For all other pollutants, the applicable Major Source threshold pursuant to the PSD program is 250 tpy. For purposes of PSD, the source is minor for all applicable pollutants.

2. Title V Major Source Status by Pollutant

The Title V major source VOC limit is 100 tpy for DeKalb County. Potential VOC emissions from the facility is 35 tons/year. Therefore, the facility is a true minor source under Title V for all pollutants. The Permittee has opted to continue its Title V major source status for permitting flexibility.

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	n/a			
CO	n/a			
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

This facility is subject to NESHAP 40 CFR 63, Subpart BBBBBB, Area source GACT “*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*”, since it meets the definition of a bulk terminal and it is not subject to the major source NESHAP 40 CFR Part 63, Subpart R.

MACT Part 63 - Subpart WW – Storage Vessels (Tanks)- Control Level 2 - Storage Tank 25-7 is not explicitly subject to the standard, the tank is subject to NESHAP Subpart BBBBBB. As a NESHAP compliance option, the terminal has elected to follow Subpart WW control requirements within §63.1063(a)(1) and (b).

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	no

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

This facility has a 25-ton per year VOC emission limit for ethanol handling. This limit keeps a previous modification allowing the handling of ethanol from being a major modification under pertinent NAA/NSR provisions. The facility also has an annual throughput limit of 357,500,000 gallons for gasoline, as well as an emission limitation of 10 mg of VOC per liter of gasoline or ethanol loaded. These limitations make the facility a minor source for HAPs, and therefore makes the MACT gasoline terminal standard, 40 CFR 63, Subpart R, inapplicable.

B. Applicable Rules and Regulations

The facility shall comply with the provisions of 40 CFR 63, Subpart R that assure continued non-applicability of the subpart and continue to maintain its area/minor source status with regard to HAP emissions. Emission Screening Factor ET calculations are not needed for this facility as long as it complies with applicable record keeping and notification requirements for determination of ET as specified in 40 CFR 63, Subpart R.

This facility is subject to applicable general provisions in Part VIII of the permit and Georgia Rule 391-3-1-.02(2)(a).

C. Compliance Status

The Title V renewal permit application TV-622511 indicates compliance with all applicable rules and regulations.

D. Permit Conditions

Condition 2.1.1 was carried over from the current Title V operating permit No. 5171-089-0120V-05-0. This condition requires that the potential VOC emissions from the handling and loading of ethanol at the facility cannot equal or exceed 25 tons during any consecutive 12 months in order to allow a previous modification to avoid non-attainment area NSR. This emission limit allowed a previous modification to be minor and thus avoid being subject to NSR review. Note that the facility-wide potential VOC emissions are still greater than 25 tons per year.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices
ID No.	Description		Description
24-8	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Mechanical shoe seal.
25-2	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Mechanical shoe seal.
25-7	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 60, Subpart K 40 CFR 63, Subpart BBBBBB	Primary wiper seal with secondary wiper seal.
35-1	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 63, Subpart BBBBBB	Mechanical shoe seal with rim-mounted secondary seal.
55-4	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Mechanical shoe seal.
20-6	Internal Floating Roof Tank	391-3-1-.02(2)(vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Mechanical shoe seal with rim-mounted secondary seal.
30-5	Vertical Fixed Roof Tank	391-3-1-.02(2)(bb) 391-3-1-.02(2)(vv)	Fixed Roof
LR-1	Tank Truck Loading Rack	391-3-1-.02(2)(cc) 391-3-1-.02(2)(ss) 40 CFR 60, Subpart XX 40 CFR 63, Subpart BBBBBB	Vapor Recovery Unit

B. Equipment & Rule Applicability

There is no change to the currently applicable regulations to sources at the Doraville Terminal.

Emission and Operating Caps:

The active carbon adsorption vapor control system i.e., VRU, is required to maintain a control efficiency of at least 90 percent and not have VOC emissions that exceed 10 milligrams per liter of gasoline and ethanol loaded at the terminal. The 90 percent control requirement is from Georgia Rule 391-3-1-.02(2)(cc) which also requires that emissions not exceed 80 milligrams per liter of gasoline loaded.

The 10 mg/liter limit was voluntarily adopted by the facility in order for this facility to be a synthetic minor/area source for HAP emissions, in conjunction with their gasoline and diesel throughput limits. Note that the facility is also a minor source of VOC emissions for Title V and PSD after redesignation of the Metro Atlanta nonattainment area for Ozone.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(cc), “*Bulk Gasoline Terminals*”, applies to this gasoline terminal and its loading rack. A 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. This facility meets all of these criteria and shall, therefore, have a control system with an efficiency of at least 90 percent and an emission rate of no more than 80 mg/liter (4.7 grains per gallon) of gasoline loaded at the terminal. The 10 milligram per liter limit (10 mg/l) listed in Condition 3.2.1 will make this facility automatically in compliance with the 80 mg/l VOC emission rate limit of Rule (cc).

Georgia Rule 391-3-1-.02(2)(ss), “*Gasoline Transport Vehicle and Vapor Collection Systems*”, applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is the primary business at this facility. The facility shall, therefore, take steps to insure that it only loads 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).

Georgia Rule 391-3-1-.02(2)(vv), “*Volatile Organic Liquid Handling and Storage*”, applies to storage tanks having capacity greater than 40,000 gallons and storing volatile organic liquid other than gasoline. These storage tanks shall be equipped with a submerged fill pipe for the transfer and storage of volatile organic liquids. Storage tanks used for the storage of ethanol and distillate fuel oil utilize a submerged fill pipe.

Tank 25-7 is subject to 40 CFR 60, Subpart K, “*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*”. Tank 25-7 shall have a floating roof.

Tanks 25-2, 55-4 and 20-6 were modified and Tank 24-8 was constructed after June 11, 1973 and prior to May 19, 1978. Therefore, these tanks are subject to 40 CFR 60, Subpart Kb, “*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*”. All these four tanks shall be equipped with floating roofs.

40 CFR 60, Subpart XX, “*Standards of Performance for Bulk Gasoline Terminals*” applies to any gasoline terminal constructed or modified after December 17, 1980. The loading rack at this facility shall meet the emission limit of 35 milligrams of VOCs per liter of gasoline loaded in this rule (although the facility has voluntarily taken a stricter limit of 10 mg/liter). In addition to the emission limit, this rule 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 ensuring compliance with these requirements is also required.

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*”. Subpart BBBBBB requires each gasoline storage tank with a capacity of less than 75 m³ (19,812 gallons) to be equipped with a fixed roof.

Subpart BBBBBB also has specific structural and operational requirements for external floating roofs and internal floating roofs of tanks subject to the rule. Subpart BBBBBB also limits the VOC/TOC emissions from gasoline loading racks to no greater than 80 mg/liter of gasoline loaded, which is the same as the limit in Rule (cc). This facility shall also comply with applicable operating, monitoring, testing, inspection, maintenance and recordkeeping and reporting requirements under Subpart BBBBBB. This regulation contains similar requirements to Subparts Kb and XX, even for emission units not previously subject to their requirements. This regulation also institutes a leak inspection program and additional record keeping requirements.

40 CFR 63, Subpart R, “*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*” establishes emission standards for gasoline distribution facilities, including bulk gasoline terminals and pipeline breakout stations that are major sources of HAP per 40 CFR 63.420(a)(2). This facility is not a major source of HAP and, as a result, is not affected by this NESHAP rule. The facility is an area source of HAPs.

40 CFR 63 Subpart WW - NESHAP Subpart WW establishes control requirements for emissions from applicable storage vessels in which another subpart references for control. While Tank 25-7 is not explicitly subject to the standard, the tank is subject to NESHAP Subpart BBBBBB. As a NESHAP compliance option, the terminal has elected to follow Subpart WW control requirements within 40 CFR 63.1063(a)(1) and (b).

This facility is not subject to 40 CFR Part 64, “*Compliance Assurance Monitoring (CAM)*”, since it is subject to 40 CFR 63, Subpart BBBBBB, a MACT standard promulgated after November 15, 1990. In complying with the monitoring requirements of NESHAP Subpart BBBBBB, this facility will be considered to be in compliance with CAM-like requirements already.

C. Permit Conditions

Condition 3.2.1 was carried from the current Title V operating permit No. 5171-089-0120-V-05-0. This condition limits the gasoline throughput at this facility to 357,500,000 gallons and distillate fuel to 150,000,000 gallons during any consecutive 12 month period. It also limits the maximum VOC emission rate to less than 10mg/liter for truck loading. This condition keeps the facility a synthetic minor source for HAP emissions, thus avoiding being subject to the gasoline MACT standard, 40 CFR 63, Subpart R.

Condition 3.3.1 was carried from the current permit. For the existing loading rack, this condition requires that gasoline only be loaded into vapor tight trucks and records be kept by the facility to ensure compliance with this requirement. These requirements are taken directly from NSPS Subpart XX.

Carried over from the current permit, Condition 3.3.2 requires Tank 25-7 to comply with the applicable requirement in NSPS Subpart K for having a floating roof, a vapor recovery system or its equivalent. Currently the tank is equipped with a floating roof and served by the VRU.

Carried over from the current permit, Condition 3.3.3 contains the applicable requirements of NSPS Subpart Kb for internal floating roof tanks and applies to storage tanks 20-6, 24-8, 25-2 and 55-4.

Tank 35-1 shall also comply with the requirements of this condition, but only subparagraphs a through c, since it is not actually subject to NSPS Subpart Kb. In the past the facility opted to comply with subparagraphs a through c of this condition as their method of showing compliance with 40 CFR 63, NESHAP Subpart BBBBBB.

Condition 3.3.4 was carried from the current permit. This condition contains the applicable requirements of NSPS Subpart WW for Tank 25-7. In the past the facility opted to comply with these requirements for this tank in order to comply with NESHAP Subpart BBBBBB. This selection was given in their initial compliance notification submitted when becoming subject to NESHAP Subpart BBBBBB. The requirements are very similar to NSPS Subpart Kb requirements.

Condition 3.4.1 was carried from the current permit. This state only enforceable condition requires painting of all above ground tanks with a capacity of 40,000 gallons or greater and used to store petroleum liquid with a true vapor pressure of 1.5 psia or greater, with a paint of a heat-reflective nature when repainted.

Condition 3.4.2 was carried over from the current permit. This condition requires compliance with Rule (bb) as to have floating roofs on the large gasoline storage tanks. These tanks have been subject to this rule, however, NSPS Subparts K and Kb have similar but stricter requirements.

Carried over from the current permit, Condition 3.4.3 requires the facility to comply with Rule (cc) and contains detailed applicable operational requirements for VOC/gasoline vapor emission control and VOC emission limit. The facility is complying with the VOC emission limit in this condition via compliance with the stricter VOC emission limit in Condition 3.2.1.

Carried over from the current permit, Condition 3.4.4 requires compliance with the operating, emission control, record keeping and notification requirements of Rule (ss) detailed in the condition.

Condition 3.4.5 was carried from the current permit. It requires the facility to comply with Rule (vv) and use submerged fill pipes to transfer volatile organic liquid other than gasoline from delivery vessels into storage tanks. This mainly applies to ethanol.

Both Conditions 3.5.1 and 3.5.2 were carried from the current permit. Condition 3.5.1 contains requirements for routine maintenance on all air pollution control equipment. Condition 3.5.2 requires the keeping of a spare parts inventory for the vapor control equipment. Both conditions ensure the proper function of air pollution control equipment involved the minimization of VOC emissions, and the compliance with the applicable VOC emission limits.

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

All the conditions in this subpart were carried over from the current permit without any changes.

Condition 5.2.1 requires the company to install, calibrate, operate, and maintain a breakthrough detector and interlock system to continuously monitor and indicate the hydrocarbon concentration at the outlet of the VRU to prevent gasoline loading operations upon detecting breakthrough at the outlet of the VRU. The facility uses a system that records the concentration in parts per million, then uses an algorithm to calculate the milligrams of VOCs emitted per liter of gasoline loaded. Conditions 5.2.2, 5.2.3 and 5.2.4 require monitoring devices used as part of the interlock loading system that assures the VRU works properly. Condition 6.1.7b.i. requires that a reportable exceedance shall be reported if pressure-vacuum system failures or excess emissions are detected. This monitoring requirement will provide a reasonable assurance that emissions levels are reduced to comply with emission limitations contained in Conditions 3.2.1 and 3.4.3.

Condition 5.2.5 requires the company to conduct monthly inspections (via sight, sound or smell) for leaks. Also, the pressure measurement device required by Condition 5.2.2 would detect potential leaks. An excursion shall be reported when leaks are not properly addressed as specified in Condition 6.1.7c.ii. The monitoring strategy for leaks provides a reasonable assurance of compliance with requirements contained in Conditions 3.3.1 and 3.4.3. Because Condition 3.4.3 specifies requirements for a reasonable assurance that gasoline transport vehicles do not leak, Condition 6.1.7c.i. requires reporting of an excursion if a non-vapor-tight gasoline cargo tank is loaded without taking reasonable precautions.

Conditions 5.2.6, 5.2.7 and 5.2.8 were carried over from the current permit without change. Conditions 5.2.6 and 5.2.7 have the NSPS Subpart Kb monitoring requirements for the four tanks subject to this rule. Similarly, Condition 5.2.8 has the applicable NSPS Subpart WW requirements for Tank 25-7. The facility agreed to meet the NSPS Subpart WW requirements for this tank as a means of showing compliance with NESHAP 40 CFR Part 63, Subpart BBBB.

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

All the conditions in this subpart were carried over from the current permit without change.

Condition 6.2.1 requires the facility to keep records of vapor control system malfunctions and the maintenance performed on the vapor control system.

Conditions 6.2.2 and 6.2.3 require the facility to keep the following records for the purposes of the report required by Condition 6.1.4:

- a. Leak detection found during the monthly inspections specified in Condition 5.2.5, or a pressure measurement in excess of 500 mm in accordance with Condition 5.2.2.
- b. Each instance of a loading a non-vapor-tight gasoline cargo tank at the facility
- c. Each leak detected for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection.
- d. Continuous monitoring data required under condition 5.2.1.

Condition 6.2.4 requires the facility to keep specific records of the test results for each gasoline cargo tank truck loaded at this facility per Rule (ss)

Condition 6.2.5 requires the facility to keep daily records of gasoline, distillate oil and ethanol throughput for the loading rack and use the records to calculate monthly throughput and annual rolling average of throughput of these fuels for the loading rack for the purpose of demonstrating compliance with the throughput limits in Condition 3.2.1.

For the purpose of demonstrating compliance with the VOC limit in Condition 2.1.1, Condition 6.2.6 contains specific requirements for keeping daily log of all ethanol throughput for tank truck loading operations, and for calculating monthly and annual rolling average of VOC emissions from such operations.

The specific record keeping and reporting requirements of NSPS Subpart Kb are contained in Conditions 6.2.7 through 6.2.10.

The requirements for NSPS Subpart WW are contained in Conditions 6.2.10 and 6.2.11. All of these requirements are taken directly from the relevant regulations without any changes.

Per NESHAP Subpart WW, Condition 6.2.12 requires the submittal of a copy of the inspection record (required in Condition 5.2.8) when inspection failures occur.

VII. Specific Requirements

A. Operational Flexibility

The applicant did not include any alternative operating scenarios in this Title V application.

B. Alternative Requirements

No new alternative requirements were requested by the facility under Rule 391-3-1-.03(10)(d)8 to combine multiple overlapping of state and federal requirements in this Title V permit renewal application.

C. Insignificant Activities

See Permit Application on GEOS website <http://gatv.georgiaair.org/GATV/default.asp>. See Attachment B of the permit and Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application). There is no change to insignificant activities based on emission levels in the renewal permit application.

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

None

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.//