Facility Name: **MPLX Terminals, LLC - Powder Springs Terminal**
City: Austell
County: Cobb
AIRS #: 04-13-067-00032

Application #: TV-622514
Date Application Received: January 18, 2022
Permit No: 5171-067-0032-V-08-0

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: MPLX Terminals, LLC - Powder Springs Terminal

2. Parent/Holding Company Name

   MPLX Terminals LLC

3. Previous and/or Other Name(s)

   Marathon Oil Company till January 1998

   Marathon Ashland Petroleum LLC till August 31, 2005

   Marathon Petroleum Company LP - Powder Springs till April 2016

   MPLX Terminals, LLC - Powder Springs Terminal

4. Facility Location

   3895 Anderson Farm Road
   Austell, Georgia 30334 (Cobb County)

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

   This facility is located in an area designated as a moderate non-attainment area for ozone under National Ambient Air Quality Standards (NAAQS) and the Atlanta $PM_{2.5}$ Maintenance Area after redesignation from severe non-attainment area on February 24, 2016. The Title V and NSR major source thresholds for VOC for this facility is now 100 tpy. The NSR major source threshold used to be 25 tons per year (tpy) before the redesignation. The terminal is located in area currently considered a moderate NAA with respect to 2008 8 hour Ozone Standard. Per 40 CFR 52.21 (b)(1)(i)(c)(iii), the terminal is not one of the 28 source categories that must account for fugitive emissions in its major source status. The terminal is a minor source with respect to PSD and Title V. For all other pollutants the PSD major source threshold is 250 tpy. Potential VOC emissions from the facility is 70 tpy.

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
5171-067-0032-V-07-0	January 12, 2018	Title V Permit Renewal

D. Process Description

1. SIC Codes(s): 5171 - Petroleum Bulk Stations and Terminals

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 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 are controlled with vapor recovery unit, and as a back-up, a vapor combustor (flare) can be used. There are eight large petroleum products storage tanks at this facility. Six of these tanks are equipped with internal floating roofs, and the remaining two tanks have fixed roof. There are also five other small (less than 10,000 gallon capacity) tanks at this facility. Tank 30-6, 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 at the facility. Therefore, a process flow diagram (PFD) was not included in their Title V permit application (GEOS application).

E. Regulatory Status

1. PSD/NSR

This facility is currently classified as a minor source of VOC emissions in Atlanta ozone non-attainment area under pertinent new source review (NSR) rules for non-attainment area (NAA). Any modifications to this facility/source are subject to the determination of applicability to the pertinent NAA/NSR provisions. If the emission increase from the modification(s) itself is greater than the pertinent major source modification threshold(s) under NSR rules, the modification(s) will be subject to a case-by-case NSR review/permitting.

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	✓			✓
VOC	✓			✓
NO_x	✓			✓
CO	✓			✓
TRS	n/a			-
H_2S	n/a			-
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

40 CFR Part 63, 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 hazardous air pollutants (HAPs) emissions or have a calculated emissions screening factor (determined using equation per 40 CFR 63.420(a)(1)) greater than 1. 40 CFR Part 63, Subpart R does not apply to this facility because the facility is a minor/area source for HAPs emissions (The estimated potential emissions of total HAPs at their allowable throughputs are about 2.09 tons per year).

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"*, since it meets the definition of a bulk terminal and it is not subject to 40 CFR Part 63, Subpart R.

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*

- The facility is currently a minor source for Title V since potential emission of all pollutants are less than the major source threshold of 100 tons per year.

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

This facility has a 25-ton per year VOC emission limit (PSD avoidance 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 has an annual throughput limit of 412,500,000 gallons for gasoline and ethanol combined, as well as an emission limitation of 10 mg of VOC per liter of gasoline or ethanol loaded. Also, the annual throughput of distillate is limited to 200,000,000 gallons. These limitations combined, make the facility a minor/area source for HAP emissions, and therefore makes the MACT gasoline terminal standard, 40 CFR 63, Subpart R, inapplicable.

B. Applicable Rules and Regulations

The facility complies 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 E_T calculations are not needed for this facility as long as it complies with applicable record keeping and notification requirements for determination of E_T as specified in 40 CFR 63, Subpart R.

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

C. Compliance Status

Review of the Title V permit application No. TV-622514 and the compliance information at EPD indicates that the facility is operating in 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. 5171-067-0032-V-07-0. This condition limits the potential VOC emissions from the handling and loading of ethanol at the facility to less than 25 tons during any consecutive 12 months. This emission limit allowed a previous modification for gasoline reformulation to be minor under pertinent NAA/NSR rules and thus avoid being subject to a NSR review. Note that the facility-wide potential VOC emissions are still lower than 100 tons per year (Title V and PSD major source thresholds).

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices Description
ID No.	Description		
30-3	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 40 CFR 60, Subpart Ka 40 CFR 63, Subpart BBBBBB	Internal Floating Roof
30-6	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 391-3-1-.02(2) (vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Internal Floating Roof
55-5	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 391-3-1-.02(2) (vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Internal Floating Roof
67-7	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 40 CFR 60, Subpart Ka 40 CFR 63, Subpart BBBBBB	Internal Floating Roof
30-4	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 391-3-1-.02(2) (vv) 40 CFR 60 Subpart Kb 40 CFR 63 Subpart BBBBBB	Internal Floating Roof
D020	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 with the Vapor Combustion Unit as a back-up.
120-8	Internal Floating Roof Tank	391-3-1-.02(2) (bb) 391-3-1-.02(2) (vv) 40 CFR 60, Subpart Kb 40 CFR 63, Subpart BBBBBB	Internal Floating Roof

B. Equipment & Rule Applicability

Emission and Operating Caps:

The primary emission control system, i.e., the active carbon adsorption vapor recovery unit (VRU), is required to maintain a control efficiency of at least 90% and not have VOC emissions that exceed 10 mg. per liter of gasoline and ethanol loaded at the terminal. The 90% control requirement is from Georgia Rule for Air Quality Control 391-3-1-.02(2)(cc) which also requires that emissions not exceed 80 mg. per liter (4.7 grains per gallon) of gasoline loaded. The 10 mg/liter limit is voluntary and made this facility a synthetic minor/area source for HAP emissions, in conjunction with their gasoline and distillate fuel oil throughput limits. MPLX Terminals, LLC - Powder Springs Terminal inherited these operating and emission limits after purchasing the facility.

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 Rule (cc) as a facility which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons.

Rule (cc) requires affected gasoline terminals to operate a vapor collection and adsorbing or condensation system which has at least 90% of recovery efficiency, or to operate control equipment having control efficiency equivalent to or greater than that for the vapor adsorbing or condensation system. Rule (cc) also limits the VOC emission rate to no more than 80 mg. per liter (4.7 grains per gallon) of gasoline and ethanol loaded. This facility meets all of these requirements by operating a vapor recovery unit (VRU) as primary and a vapor combustion unit (VCU)/flare as a backup control for VOC emissions. The 10 milligrams per liter limit (10 mg/l) listed in Condition 3.2.1 will make this facility automatically comply with the 80 mg./l VOC emission rate limit of Rule (cc).

Georgia Rule (bb), *"Petroleum Liquid Storage"*, applies to tanks 30-3, 30-4, 30-6, 55-5, 67-7, and 120-8 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. Each of these tanks is in compliance with Rule (bb) by having an internal floating roof.

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 also automatically applies to any facility subject to Georgia 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.

Federal Regulations:

40 CFR 60, Subpart Ka, *"Standard of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification commenced after May 18, 1978 and prior to July 23, 1984"* applies to Tanks 30-3 and 67-7. Each tank must be equipped with a floating roof.

40 CFR 60, Subpart Kb, *"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", applies to* Tanks 55-5 (constructed after July 23, 1984), and 30-4 and 30-6 (both modified after July 23, 1984). The Permittee is required to visually inspect the roof and seals for tanks fitted with internal floating roofs to meet the requirements under Subpart Kb. Periodic inspections are required following the initial filling of the tank. Repairs are required to be made as necessary. The facility is required to keep records of the inspections and report problems to the Division as directed by the subpart. The facility is required to provide notification to the Division prior to filling or refilling, to afford the Division an opportunity to conduct a tank inspection.

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 racks at this facility must meet the emission limit for this regulation of 35 mg. (of VOCs) per liter of gasoline loaded (although the facility has voluntarily taken a stricter limit of 10 mg/liter). In addition to the emission limit, Subpart XX contains 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 under this regulation.

40 CFR Part 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. This facility is a minor/area source of HAP and, as a result, is not affected by Subpart R. Instead, 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".* 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, for tanks subject to the rule. Subpart BBBBBB also limits the VOC/TOC emissions from gasoline loading racks to no greater than 80 mg/l of gasoline loaded, which is the same as the limit in Georgia Rule (cc). This facility shall also comply with applicable operating, monitoring, testing, inspection, maintenance and recordkeeping and reporting requirements under Subpart BBBBBB. These requirements are identical to those in 40 CFR Subparts Kb and XX, since such requirements in Table 1 to Subpart BBBBBB refers to 40 CFR Part 60, Subparts Kb and XX. Subpart BBBBBB also institutes a leak inspection program and additional record keeping requirements.

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 over from the current permit. This condition limits facility's gasoline and distillate throughputs to 412,500,000 and to 200,000,000 gallons respectively during any consecutive 12 month. This condition also limits the maximum VOC emission rate to less than 10 mg./l for truck loading of gasoline and ethanol. This condition keeps the facility a synthetic minor source for HAP emissions, thus avoiding it to be subject to the major source gasoline MACT standard, 40 CFR 63 Subpar 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 40 CFR Part 60 Subpart XX.

Existing Condition 3.3.2 contains the applicable requirements of 40 CFR Part 60 Subpart Kb for internal floating roof tanks and applies to storage tanks 30-4, 30-6, 55-5 and 120-8. Tanks 30-3 and 67-7 shall also comply with the requirements of subparagraph a. through c. of this condition since they are not actually subject to Subpart Kb. In the past, the facility opted to comply with subparagraphs a. through c. of this condition as the elected method of showing compliance with 40 CFR 63 Subpart BBBBBB.

Existing Condition 3.3.3 contains the structural and operating requirements of 40 CFR Part 60 Subpart Ka which are applicable to tanks 30-3, 30-4 and 67-7 which were constructed, reconstructed or modified after May 18, 1978 and before July 23, 1984.

Condition 3.3.4 was carried over from the current permit. This condition requires tanks less than 75 m^3 (19,813 gallons) to be equipped with a fixed roof, as specified in 40 CFR Part 63 Subpart BBBBBB. Only tank 120-8 is subject and is in compliance with this condition.

Existing Condition 3.3.5 contains structural specifications/requirements for tanks subject to 40 CFR 63 Subpart BBBBBB.

Existing Condition 3.3.6 contains applicable operating, emission control and documentation requirements for gasoline loading racks (including gasoline tank trucks being loaded) subject to 40 CFR 63, Subpart BBBBBB.

Both Conditions 3.3.7 and 3.3.8 were carried from the current permit. These conditions contain applicable operating requirements for the loading of gasoline tank truck and for the operation of the vapor collection and control systems serving the gasoline and ethanol loading operations at the facility.

Existing Condition 3.4.1 is a **state only enforceable** condition that requires painting and repainting, using a paint of a heat-reflective nature, of all above ground tanks with a capacity of 40,000 gallons or greater and storing petroleum liquid with a true vapor pressure of 1.5 psia or greater.

Existing Condition 3.4.2 requires compliance with Georgia Rule (bb) as to having floating roofs on the large gasoline storage tanks, or as to fit each of these tanks with a control device of equal or greater control efficiency than the floating roof. All affected tanks at this facility have floating roofs. 40 CFR Part 63, Subpart BBBBBB and 40 CFR Part 60 Subparts K and Kb have similar but stricter requirements.

Existing Condition 3.4.3 requires the facility to comply with Georgia Rule (cc) and contains detailed applicable operational and emission control requirements for VOC/gasoline vapor emission control system involved. The facility complies with the VOC emission limit in this condition via compliance with the stricter VOC emission limit in Condition 3.2.1 using the VRU or VCU.

Existing Condition 3.4.4 requires compliance with the operating, emission control, record keeping, and notification requirements of Georgia Rule (ss) as detailed in the condition.

Existing Condition 3.4.5 requires the facility to comply with Georgia Rule (vv) and use submerged fill pipes to transfer volatile organic liquid other than gasoline from delivery vessels into storage tanks.

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 systems being used at the facility. Both conditions ensure the proper functioning 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

There is no change to existing Condition 4.2.1 that is included in the renewal permit.

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 change. Condition 5.2.1 not only requires the company to install, calibrate, operate, and maintain a monitoring device to detect the presence of a flame at the VCU, but also requires the operation of an interlock system which can prevent gasoline loading operations upon detecting "loss of flame/heat" at the inlet of the VCU. This facility already has such an interlock system in operation. Since the VRU is the primary VOC emission control system, this Condition will only apply when the VCU is operated as a back-up control system.

Condition 6.1.7b.i. requires reporting as an exceedance any incident of no flame at the VCU when it was in operation. This monitoring will provide a reasonable assure that the emissions levels are reduced to comply with emission limitations contained in Conditions 3.2.1 and 3.4.3.

Condition 5.2.2 requires the Permittee to determine and maintain records of the maximum true vapor pressure of any volatile organic materials with known or variable compositions stored in Tanks 30-4, 30-6, 55-5, and 120-8, as required by 40 CFR Part 60, Subpart Kb.

Condition 5.2.3 contains detailed methodology, record keeping and reporting requirements for monthly leak inspection of all equipment in gasoline service. It also specifies different time limits allowed for repairing leaks under several specified circumstances.

Condition 5.2.4 contains detailed requirements for scheduling visual inspections of empty gasoline tanks with internal floating roofs under 40 CFR Part 63, Subpart BBBBBB. This condition also contains specifications for repairs deemed necessary as found during the inspections. The condition also specifies notification requirements for such inspections.

Condition 5.2.5 contains detailed requirements for scheduling visual inspections of gasoline tanks with internal floating roofs equipped with liquid-mounted or mechanical shoe primary seals. This condition also requires the Permittee to performs repairs deemed necessary as found during the inspections or remove the defective tanks from service with 45 days of the inspection or request a 30-day extension of such repairing or tank emptying as specified. The condition also specifies notification requirements for such inspections.

Condition 5.2.6 requires the Permittee shall install, calibrate, operate, and maintain a breakthrough detector and interlock system on the VRU and loading rack to stop or prevent gasoline loading operations when proper conditions of the VRU or other equipment involved are not met. The detector is either a Flame Ionization Analyzer (FIA) based on EPA Method 25A, or a Nondispersive Infrared Analyzer (NIDA) based on EPA Method 25B, as specified in Condition 4.1.3. Both can continuously determine the concentration of total gaseous organic compounds in the air streams entering and/or exhausting from the VRU, and in the latter case compare the concentration with a preset value to alert and prevent the breakthrough of the VRU. This system usually is provided by the manufacturers and suppliers of the VRU, and other equipment involved. The breakthrough (preset value for the FIA or NIDA detector involved) defined in this condition generally corresponds to the VOC emission limit in Conditions 3.2.1 and 3.4.3.

Condition 5.2.7 specifies the inspection requirement for tanks equipped with double-seal systems per 40 CFR Part 60, Subpart BBBBBB.

Condition 5.2.8 requires the Permittee to install a pressure measurement device on each terminal's vapor recovery system and specifies the required range and precision of the device.

To prevent vapor from entering any VRU's carbon adsorption bed/column undergoing regeneration, Condition 5.2.9 requires the Permittee to install a device to continuously track the vapor staging valves position as part of interlock system.

Condition 5.2.10 details the technical requirements for a CEMS to monitor the average hydrocarbon concentration in the air stream exhausting from the VRU. The FIA or NIDA detector associated with or supplied as part of the VRU specified in Condition 5.2.6 is expected to meet these requirements.

C. Compliance Assurance Monitoring (CAM)

Emission limitations or standards subject to post November 15, 1990 NSPS or NESHAP standards are exempt from the CAM rule because these standards have been and will be designed with monitoring that provides a reasonable assurance of compliance.

This facility is subject to 40 CFR Part 63, Subpart BBBBBB which was promulgated after November 15, 1990. Therefore, it is exempt from the CAM rule.

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 any changes.

The specific record keeping requirements for the vapor combustion unit/flare (VCU) in Condition 6.2.1 ensures compliance with applicable emission limits when the VCU is being operated as backup control device for VOC/vapor emissions control from gasoline loading operations at the loading rack.

Per 40 CFR Part 60, Subpart Kb, Condition 6.2.2 requires the Permittee to maintain records of the dimensions, volatile organic liquids stored, and maximum vapor pressures for each of tanks 30-4, 30-6, 155-5 and 20-8 subject to Subpart Kb.

The record keeping requirements in Condition 6.2.3 for leak detections, pressure exceedances, emission instances and pertinent monitoring data and repair information ensure the compliance with the applicable operating and/or monitoring requirements under 40 CFR Part 63 Subpart BBBBB, per Conditions 3.3.8 and 5.2.3.

The record keeping and notification requirements in Condition 6.2.4 ensures compliance with the proper procedures under 40 CFR Part 63 Subpart BBBBB when requesting the 30-day extension as specified in Condition 5.2.5.

Condition 6.2.7 contains the applicable record keeping requirements for each gasoline cargo tank loading at this facility under 40 CFR Part 63 Subpart BBBBBB and 40 CFR Part 60 Subpart XX. The condition gives the Permittee three options for keeping the required records, depending on the relevant record keeping and verification practice or system being used at the facility. The main purpose of these requirements is to prevent gasoline cargo tanks without valid vapor tightness documentation from loading at this facility.

Condition 6.2.8 requires the Permittee to record and report any VRU's breakthrough or VCU's flame out as monitored per Condition 5.2.6 or Condition 5.2.1. The records shall also include description and timing of the steps taken to repair or to perform maintenance on the VRU or VCU to eliminate the problem. These reporting requirements are more detailed that that in Condition 6.1.7.

The record keeping requirement for certification of annual gasoline tank truck test in Condition 6.2.9 ensures that all the gasoline tank truck loaded at this facility are in compliance with applicable vapor tightness test and are tested in time, per Conditions 3.3.1, 3.3.6 and 3.3.7.

Conditions 6.2.10, 6.2.11 and 6.2.12 contains applicable record keeping, reporting and notification requirements for storage tank inspection, repair and maintenance under 40 CFR Part 60 Subpart Kb and 40 CFR Part 63 Subpart BBBBBB.

Per 40 CFR Part 63 Subpart BBBBBB, Conditions 6.2.13, 6.2.14 and 6.2.16 contain applicable record keeping, reporting and notification requirements for any malfunction which occurred during each semiannual reporting period (as per Conditions 6.1.4 and 6.1.7) and which caused or may have caused any applicable emission limitation to be exceeded.

Per 40 CFR Part 63 Subpart BBBBBB, Condition 6.2.15 contains an applicable record keeping requirement for all equipment in engaged in gasoline service at this facility.

VII. Specific Requirements

A. Operational Flexibility

None

B. Alternative Requirements

None

C. Insignificant Activities

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

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

None

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

None

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.//