

CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Part 70 Operating Permit
Source: 13
Issued in accordance with the
Clark County Air Quality Regulations (AQR)
(AQR 12.5)

ISSUED TO: Calnev Pipeline, LLC

SOURCE LOCATION:

5049 North Sloan Avenue
Las Vegas, Nevada 89115
T19S, R62E, Sections 34
Hydrographic Basin Number: 212

COMPANY ADDRESS:

1100 Town and Country Road
Orange, California 92868

NATURE OF BUSINESS:

SIC Code 4226: Petroleum and Chemical Bulk Stations and Terminal for Hire
NAICS: 424710: Petroleum Bulk Stations and Terminals

RESPONSIBLE OFFICIAL:

Name: Philip Vasquez
Title: Director of Operations
Phone: 909-873-5123
Fax Number: 303-964-3778

Permit Issuance Date: December 16, 2011

Minor Revision: June 5, 2015

Expiration Date: December 15, 2016

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY



Lewis Wallenmeyer
Control Officer, Clark County Department of Air Quality

EXECUTIVE SUMMARY

The Calnev Pipeline LLC (Calnev) Las Vegas site is a bulk fuel transfer facility that began operations in 1961 and is located in the Las Vegas Valley, Hydrographic Area 212. Calnev is classified as a Categorical Stationary Source, as defined by AQR 12.2.2(j)(23): Petroleum storage and transfer units with total storage capacity exceeding 300,000 barrels. Calnev is a major stationary source of VOC emission and a minor source for all other criteria pollutants and HAP. The Calnev source emits particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC) and hazardous air pollutants (HAP) as a result of the storage and loading of petroleum fuels, combustion of propane and diesel, haul road traffic and a large soil and groundwater remediation project.

Fuels are delivered to the site by two underground pipelines originating in southern California. Incoming fuels are diverted to storage tanks. From these storage vessels fuels are piped to other terminals (e.g. Nellis Air Force Base) or to delivery trucks. As the trucks are filled, specialized additives are injected according to customer's specifications. These fuel additives arrive at the facility via truck or rail.

The following table summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 Operating Permit. The source-wide PTE is not an emission limitation:

Source-Wide PTE (tons per year)

PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAP
7.42	0.04	2.60	2.87	0.17	186.87	10.43

The Part 70 Operating Permit (Part 70 OP) was renewed on December 16, 2011, and a minor permit revision was issued on December 20, 2012. On June 20, 2013, the Permittee was issued a minor revision of the operating permit. An administrative revision was issued on August 23, 2013. A minor revision of the permit was issued September 23, 2014. Another application for minor revision was received on April 21, 2015 to increase the RVP in multifuel tanks from 10 to 11.

Pursuant to AQR 12.5.2 all terms and conditions in Sections I through V and Attachment 1 in this permit are federally enforceable unless explicitly denoted otherwise.

TABLE OF CONTENTS

I.	ACRONYMS.....	4
II.	GENERAL CONDITIONS	5
	A. General Requirements.....	5
	B. Modification, Revision, Renewal Requirements	6
	C. Reporting/Notifications/Providing Information Requirements.....	6
	D. Compliance Requirements.....	7
	E. Performance Testing Requirements	9
III.	EMISSION UNITS AND APPLICABLE REQUIREMENTS.....	10
	A. Emission Units.....	10
	B. Emission Limitations and Standards.....	13
	1. Emission Limits.....	13
	2. Operation Limits.....	16
	3. Emission Controls	18
	C. Monitoring	23
	D. Testing	30
	E. Record Keeping	31
	F. Reporting	34
	G. Mitigation	35
IV.	OTHER REQUIREMENTS	36
V.	PERMIT SHIELD	36
	ATTACHMENT 1	37

I. ACRONYMS

Table I-1: List of Acronyms and Abbreviations

Acronym	Term
API	American Petroleum Institute
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
AST	Above Ground Storage Tank
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
CAAA	Clean Air Act, as amended, or Clean Air Act Amendments
CEMS	Continuous Emissions Monitoring System
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
DOM	Date of Manufacture
EPA	United States Environmental Protection Agency
EU	Emission Unit
FR	Fixed Roof
HAP	Hazardous Air Pollutant
HP	Horse Power
MACT	Maximum Achievable Control Technology
M/N	Model Number
NAICS	North American Industry Classification System
NO _x	Nitrogen Oxides
NRS	Nevada Revised Statutes
NSR	New Source Review
OP	Operating Permit
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RATA	Relative Accuracy Test Audits
RVP	Reid Vapor Pressure
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO _x	Sulfur Oxides
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. General Requirements

1. The Permittee shall comply with all conditions of the Part 70 Operating Permit. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations, Nevada law, and the Clean Air Act and is grounds for the following: enforcement action; permit termination; revocation and reissuance; revision; or denial of a permit renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 12.5.2.6(f)]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. *[AQR 12.5.2.6(h)]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. *[AQR 5.1.1]*
6. The Permittee agrees to allow inspection of the premises, to which this permit relates, by the Control Officer at any time during the Permittee's hours of operation without prior notice. The Permittee shall not obstruct, hamper or interfere with any such inspection. *[AQR 4.3.3; AQR 4.9; AQR 12.5.2.8(b)]*
7. The Permittee shall allow the Control Officer, upon presentation of credentials to: *[AQR 4.3 and 12.5.2.8(b)]*
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
 - d. Document alleged violations using devices such as cameras or video equipment.
8. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit. A responsible official shall certify the additional information consistent with the requirements of AQR Section 12.5.2.4. *[AQR 12.5.2.2]*

9. The Permittee who has been issued a permit under Section 12.5 shall post such permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. *[AQR 12.5.2.6(m)]*

B. Modification, Revision, Renewal Requirements

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an ATC Permit from the Control Officer *[AQR 12.4.1.1(a)]*
2. The permit may be revised, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
 - a. The Permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal, except that a complete application need not be received before a Part 70 general permit is issued pursuant to Section 12.5.2.20; and
 - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of Section 12.5
4. The Permittee shall not build, erect, install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere reduces or conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 60.12]*
5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
6. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
7. For purposes of permit renewal, a timely application is a complete application that is submitted at least six (6) months and not greater than eighteen (18) months prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

C. Reporting/Notifications/Providing Information Requirements

1. The Permittee shall submit all compliance certifications to EPA and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*

2. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or AQRs shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under AQR 12.5 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
3. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit, or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
4. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and the Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from the source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.4]*
5. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory must be submitted to Air Quality by March 31 of each calendar year; and
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.

D. Compliance Requirements

1. The Permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*
2. Any person who violates any provision of the AQR, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by Air Quality is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
3. Any person aggrieved by an order issued pursuant to AQR Section 9.1 is entitled to review as provided in Chapter 233B of NRS. *[AQR 9.12]*

4. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
5. The Permittee shall certify compliance with terms and conditions contained in the OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
6. The Permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W Russell Road, Suite 200, Las Vegas, Nevada 89118) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne Street, San Francisco, California 94105). A compliance certification for each calendar year will be due on January 30th of the following year and shall include the following: *[AQR 12.5.2.8(e)]*
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period. The methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR 70.6(a)(3). If necessary, the Permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
 - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in subsection II.D.6(b). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
7. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) any startup, shutdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*
 - a. within twenty-four (24) hours of the time the Permittee learns of the excess emissions, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email: airquality@clarkcountynv.gov; and
 - b. within seventy-two (72) hours of the notification required by paragraph (a) above, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.
8. The Permittee shall report to the Control Officer with the semiannual monitoring report all deviations from permit conditions that do not result in excess emissions,

including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*

9. The owner or operator of any source required to obtain a permit under Section 12 shall report to the Control Officer emissions that are in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health, safety or the environment as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered, with a written report submitted within two (2) days of the occurrence. *[AQR 25.6.2]*

E. Performance Testing Requirements

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the Air Quality regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. *[AQR 4.5]*
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. *[AQR 4.6]*
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, NV 89118) not less than 45, nor more than 90 days prior to the anticipated date of the performance test, unless otherwise specified in Section III.D. *[AQR 12.5.2.8]*
4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA, to demonstrate compliance with a requirement under 40 CFR Part 60. *[40 CFR 60.8(b)]*
5. The Permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days from the end of the performance test. *[12.5.2.8]*

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. Emission Units

1. The stationary source covered by this Part 70 OP consists of the emission units and associated appurtenances summarized in Table III-A-1. [AQR 12.5.2.3]

Table III-A-1: List of Emission Units

EU	Equipment ID Number	Rating	Description and Product Storage
A01	Tank 530	11,200 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A02	Tank 531	12,890 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A03	Tank 532	8,080 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A04	Tank 533	11,330 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A05	Tank 534	8,080 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A06	Tank 535	8,080 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A07	Tank 536	17,550 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A08	Tank 537	22,250 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A09	Tank 538	11,330 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A10	Tank 539	11,330 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/external floating roof w/primary and secondary seal
A11	Tank 540	16,320 bbl	Gasoline, diesel/biodiesel, denatured ethanol transmix , aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A12	Tank 541	25,100 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/domed external floating roof w/primary and secondary seal
A13	Tank 524	18,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A14	Tank 542	45,000 bbl	Diesel/biodiesel w/internal floating roof w/primary and secondary seal
A15	Tank 543	35,000 bbl	Diesel/biodiesel w/internal floating roof w/primary seal
A16	Tank 545	37,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal

EU	Equipment ID Number	Rating	Description and Product Storage
A17	Tank 546	40,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A18	Tank 522	4,000 bbl	Denatured ethanol w/ Internal floating roof w/primary and secondary seal
A19	Tank 525	50,000 bbl	Diesel/biodiesel w/fixed roof
A20	Tank 526	50,000 bbl	Diesel/biodiesel w/fixed roof
A21	Tank 547	50,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A22	Tank 512	50,000 bbl	JP-8 and diesel/biodiesel fuel w/fixed roof
A23	Tank 510	40,000 bbl	JP-8 and diesel/biodiesel fuel w/external floating roof primary seal
A24	Tank 511	40,000 bbl	JP-8 and diesel/biodiesel fuel w/external floating roof primary seal
A25	ASA Conductivity improver	1.3 bbl	jet fuel additive w/fixed roof
A26	Tank 500AIA	252 bbl	jet fuel additive w/internal floating roof
A27	Tank 501	4,000 bbl	Denatured ethanol Internal w/floating roof w/primary and secondary seal
A28	Tank 523	10,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A29	Tank 544	11,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel W/internal floating roof w/primary and secondary seal
A30	Tank 533A	252 bbl	Gasoline additive w/fixed roof
A31	Tank 537A	464 bbl	Gasoline additive w/fixed roof
A32	Tank 541A	380 bbl	Gasoline additive w/fixed roof
A33	Tank 541B	380 bbl	Gasoline additive w/fixed roof
A34	Tank 542D	215 bbl	Gasoline additive w/fixed roof
A35	Tank 542A	143 bbl	Gasoline additive w/fixed roof
A36	Tank 531A	143 bbl	Lubricity additive w/fixed roof
A37	Tank 542C	12 bbl	Diesel dye w/fixed roof
A38	Tank 537B	477 bbl	Gasoline Additive w/fixed roof
A39	Tank 531B	119 bbl	Gasoline additive w/fixed roof
A45	Tank 548	12,890 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/domed external floating roof w/primary and secondary seal
A46	Tank 549	12,890 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/domed external floating roof w/primary and secondary seal
A47	Tank 550	20,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A48	Tank 551	10,100 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
A49	Tank 542B	4 bbl	Red Dye additive w/fixed roof
A53	Tank 548B	238 bbl	Gasoline additive w/fixed roof
A54	Tank 548A	238 bbl	Gasoline additive w/fixed roof
A55	Tank 476	357 bbl	Waste water w/fixed roof

EU	Equipment ID Number	Rating	Description and Product Storage
A56	Tank 513	50,000 bbl	Jet A and diesel/biodiesel fuel w/internal floating roof w/primary and secondary seal
A57	Tank 514	50,000 bbl	Jet A and diesel/biodiesel fuel w/internal floating roof w/primary and secondary seal
A58	Tank 553	80,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seals
A59	Tank 554	80,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seals
A60	Tank 555	80,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seals
A61	Tank 552	40,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seals
B01	Loading Lanes		Miscellaneous losses/leaks-loading racks
B01A	B-100 Offloading Rack	400 gpm	Miscellaneous losses/leaks-offloading racks
B02	John Zink VRU		Vapor control unit, loading lanes
B04	Tank 500	3,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
B05	Tank 521	5,000 bbl	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/internal floating roof w/primary and secondary seal
B06	Piping and Fittings		Misc. losses/leaks from valves, flanges, pumps and VCU
B10	Flare Processing		Vapor control unit for loading lanes (includes saturator and vapor holding tank)
D01	Tank DG	250 gal	Diesel/biodiesel w/fixed roof acquire this info.
D02	Emergency Fire Pump	208 hp	Cummins Engine MN: 6BTA5.9-F1; SN: 45175100 DOM: 1990
E01	Roads (paved)	0.5 mi RT	Haul Roads
F01	Water Surge Tank		Waste water treatment: oil/water separator
F04	Evap. Tank/Pond		Wastewater evaporation tank/pond
F05	Surge Tank	10,000 gal	Wastewater run-off collection UST
F06	Surge Tank	10,000 gal	Wastewater run-off collection UST
SR04	Baker VRU	6,000 cfm	Soil and groundwater vapor extraction system
P1	Nellis Line Prover	942 gal	Horizontal loop piping circuit
P2	Main Line Prover	844 gal	Horizontal loop piping circuit
H01	Roads (paved)	1.0 mi RT	Service Roads
	Roads (unpaved)	0.60 mi RT	
H02	Mainline Sump	1,000 gal	Mainline sump UST
H03	Rack Sump	3,000 gal	Rack sump UST
H04	Mainline sump	4,200 gal	New mainline sump UST
H05	Cooling tower	220 gpm	Baltimore Aircoil Cooling Tower; M/N: F2841KE S/N: U013422001MAD
H06	Nellis Sump	2,000 gal	Nellis delivery system sump, UST for JP-8 fuel
H07	Rack Sump	1,000 gal	Rack 6 sump, UST for diesel/biodiesel fuel
H08	QC Sump	100 gal	Quality control lab sump UST
H09	Ethanol	76,104,000 gal/year	Ethanol unloading system
H10	Tank 500B	10,000 gal	Jet fuel additive storage tank, AST, vertical-w/fixed roof

EU	Equipment ID Number	Rating	Description and Product Storage
H11	OWS Tank		Oil-water separator tank
H12	OST-100-DW	1,000 gal	Oil storage tank, AST horizontal, w/dual wall and fixed roof
H13	Parts washer	3.25 gal	35"W x 24"L x17"D R&D Fountain Industries Company Parts Washer
H14	ASA Tote	350 gal	Anti-static agent ; Rectangular AST, fixed roof
H15	CI Tote	350 gal	Corrosion Inhibitor; Rectangular AST, fixed roof
H16	Lane 7 Red Dye Tote	350 gal	Red Dye BK-50; Rectangular AST, fixed roof

EU	Rating	Type	Manufacturer	Model No.	Serial No.
B11	48 HP	Air Compressor	John Deere	4045DF150F	PE4045D107913
		Engine – Diesel DOM: 2000			

Table III-A-2: Insignificant Emission Unit

Equipment	Description
Tank 535-A	Diesel Lubricity Additive Storage Tank, 10,000 gallons, 0.026 psia
Tank 479	479 gallon AST
B-100 Prover	Portable Prover for B-100 fuel

B. Emission Limitations and Standards

1. Emission Limits

- a. The Permittee shall not allow actual emissions from each emission unit to exceed the PTE listed in Tables III-B-1 through III-B-8 in any consecutive 12-month period. *[AQR 12.5.2.3 and NSR ATC/OP 13 Modification 6, Section II-B Condition 1, Tables II-B-1 and II-B-2 (03/29/2004) and minor revision submitted 4/21/2015]*

Table III-B-1: Storage Tank PTE and Throughputs

EU	Unit ID	Product ¹	Annual Throughput (gallon/year)	VOC PTE (tons/year)
A01	530	multi fuel	28,560,000	1.33
A02	531	multi fuel	32,460,000	1.41
A03	532	multi fuel	20,340,000	1.14
A04	533	multi fuel	28,560,000	1.33
A05	534	multi fuel	20,340,000	1.14
A06	535	multi fuel	20,340,000	1.14
A07	536	multi fuel	44,220,000	1.65
A08	537	multi fuel	90,000,000	1.88
A09	538	multi fuel	28,560,000	2.76
A10	539	multi fuel	50,000,000,	1.38
A11	540	multi fuel	137,000,000	1.54
A12	541	multi fuel	864,000,000	1.86
A13	524	multi fuel	50,760,000	0.65
A14	542	diesel/biodiesel	118,500,000	0.18
A15	543	diesel/biodiesel	114,660,000	0.18
A16	545	multi fuel	88,200,000	2.18
A17	546	multi fuel	100,800,000	2.81
A18	522	denatured ethanol	9,000,000	0.28

EU	Unit ID	Product ¹	Annual Throughput (gallon/year)	VOC PTE (tons/year)
A19	525	diesel/biodiesel	350,000,000	1.96
A20	526	diesel/biodiesel	220,500,000	1.57
A21	547	multi fuel	100,800,000	2.81
A22	512	JP-8 and diesel/biodiesel fuel	126,000,000	1.58
A23	510	JP-8 and diesel/biodiesel fuel	100,800,000	0.19
A24	511	JP-8 and diesel/biodiesel fuel	100,800,000	0.19
A27	501	denatured ethanol	9,540,000	0.25
A28	523	multi fuel	23,580,000	1.53
A29	544	multi fuel	27,720,000	1.72
A45	548	multi fuel	32,460,000	1.61
A46	549	multi fuel	32,460,000	1.04
A47	550	multi fuel	70,000,000	2.07
A48	551	multi fuel	50,400,000	1.75
A55	Waste water Tank	Waste water	n/a	0.01
A56	513	Jet A and diesel/biodiesel fuel	189,000,000	0.48
A57	514	Jet A and diesel/biodiesel fuel	189,000,000	0.48
A58	553	multi fuel	302,400,000	4.36
A59	554	multi fuel	604,800,000	4.97
A60	555	multi fuel	604,800,000	4.63
A61	552	multi fuel	126,000,000	2.26
B04	500	multi fuel	7,560,000	0.45
B05	521	multi fuel	12,720,000	1.24
D01	Tank DG	diesel/biodiesel	25,000	0.01
F01	Water Surge Tank	Waste water	n/a	0.01
F04	Evaporation Tank	Waste water	n/a	0.01
F05	UST Surge Tank	Waste water	n/a	0.01
F06	UST Surge Tank	Waste water	n/a	0.01
H02	Mainline Sump	waste fuel	302,400	0.37
H03	Rack Sump	waste fuel	806,400	1.04
H04	New Mainline Sump	waste fuel	100,800	0.47
H06	Nellis Sump	waste fuel	75,600	0.01
H07	Rack Sump	waste fuel	36,000	0.01
H08	QC Sump	waste fuel	7,200	0.02
H11	OWS tank	Oil water separator	15,768,000	0.08
H12	OWS-100-DW	waste fuel/oil/ water	365,000	0.03

¹ Multi fuel is defined as gasoline, diesel/biodiesel, jet fuel, denatured ethanol and/or transmix.

Table III-B-2: Fuel Additive Storage Tanks PTE and Throughputs

EU	Facility Number/Identifier	Tank Type	Throughput (gallons/year)	VOC PTE (tons/year)
A25	ASA	FR AST	5,040	0.01
A26	500A	FR AST	95,949	0.05
A30	533A	FR AST	95,949	0.05
A31	537A	FR AST	95,949	0.05
A32	541A	FR AST	148,050	0.12
A33	541B	FR AST	148,050	0.12

EU	Facility Number/Identifier	Tank Type	Throughput (gallons/year)	VOC PTE (tons/year)
A34	LV 005	FR AST	81,207	0.01
A35	Amoco	FR AST	79,286	0.06
A36	Shell	FR AST	55,661	0.04
A37	Diesel Dye	FR AST	5,040	0.01
A38	537B	FR AST	95,949	0.02
A39	M-1	FR AST	44,100	0.03
A49	LV 006	FR AST	5,040	0.01
A53	Exxon 2	FR AST	57,519	0.04
A54	Texaco 1	FR AST	95,949	0.07
H10	500B	VFR AST	132,000	0.01
H14	ASA Tote	VFR AST	390	0.01
H15	CI Tote	VFR AST	3,300	0.01
H16	Lane 7 Red Dye Tote	VFR AST	6,150	0.01

Table III-B-3: Loading Rack PTE and Throughputs

EU	Description	Product	Throughput (gallons/yr) ²	VOC ¹ (tons/year)
B01	Loading Rack Fugitive Emissions	gasoline	977,278,302	62.04
		diesel/biodiesel	366,790,872	0.07
		jet fuel	81,545,856	0.02
		ethanol	51,307,116	0.32
		transmix	7,174,440	0.32
B01A	Offloading Rack Fugitive Emissions	B-100	147,168,000	0.07

¹ The VOC emissions from B01 account for the VOC emissions from B10.

² The throughputs listed in this table are for VOC emissions and for informational purposes only.

Table III-B-4: Vapor Recovery Unit PTE (tons/year)

EU	Description	VOC
B02	John Zinc Vapor Recovery Unit	13.81

Table III-B-5: Auxiliary Flare PTE (Combustion Emissions)(tons/year)

EU	Description	Pollutant	PTE
B10	Flare Processing Unit	PM ₁₀	0.23
		NO _x	0.29
		CO	2.46
		SO _x	0.14

Table III-B-6: Ethanol Unloading System PTE and Throughput

EU	Description	Throughput (gal/yr)	VOC ¹ (tons/year)
H09	Ethanol Unloading System	76,104,000	0.18

¹ The PTE is based on the residual vapors (11,986,961 gallon-vapor/year) remaining in the piping of the ethanol unloading system after rail car and tanker unloading and not the actual throughput of the ethanol unloading system

Table III-B-7: Fittings PTE and Quantities (tons/year)

EU	Fitting Type	Number of Fittings	VOC
B06	Valves in LLG	2,376	0.30
	Valves in LL	1,230	0.51
	Valves in HL	1,598	0.66
	Fittings in LLG	6,455	2.62
	Fittings in LL	3,294	0.25

EU	Fitting Type	Number of Fittings	VOC
	Fittings in HL	4,620	0.36
	Pumps in LLG	56	0.04
	Pumps in LL	27	0.14
	Pumps in HL	27	0.14
	Other in LLG	434	0.50
	Other in LL	239	0.30
	Other in HL	321	0.40
	Relief Devices in LLG	35	0.04
	Relief Devices in LL	12	0.02
	Relief Devices in HL	24	0.03

Table III-B-8: Ancillary Emission Unit PTE (tons per year)

EU	Description	PM ₁₀	PM _{2.5}	NO _x	CO	SO _x	VOC
D02	Emergency Fire Pump	0.03	0.03	0.39	0.08	0.01	0.03
SR04	Soil and Groundwater Vapor Extraction Unit	0.06		1.84	0.31	0.01	37.62
E01	Haul Roads	6.56					
H01	Service Roads	0.52					
H05	Baltimore Aircoil Cooling Tower	0.01					
P01	Nellis-Line Prover						0.06
P02	Main-Line Prover						0.05
H13	R&D Fountain Industries Company Parts Washer M/N: 555061 E200						1.17

Table III-B-9: Diesel Engine PTE (tons per year)

EU	Description	PM ₁₀	PM _{2.5}	NO _x	CO	SO _x	VOC
B11	Air Compressor Diesel Engine	0.01	0.01	0.08	0.02	0.01	0.01

- b. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

Vapor Recovery Unit

- c. The Permittee shall operate the vapor collection system (EU: B02) so that the emissions to the atmosphere do not exceed 2.4 milligrams of total volatile organic compounds per liter of gasoline (0.02 lbs/1,000 gallon of product loaded) over a four hour average. The emission limit shall not include the start-up and shut-down of the system. [NSR ATC/OP 13, Modification 6, Condition III-A-22 (03/29/2004)]

Soil and Groundwater Vapor Extraction Unit

- d. The Permittee shall operate the soil and groundwater vapor extraction unit (EU: SR04) so that the emissions to atmosphere do not emit any visible black or white smoke. [NSR ATC/OP 13, Modification 6, Condition III-E-17 (03/29/2004)]

2. Operation Limits

Storage Tanks

- a. The Permittee shall limit the total annual tank throughput of all tanks identified in Tables III-B-1 and III-B-2 to 107,250,127 barrels (4,504,505,338 gallons) in any consecutive 12-month period. [NSR ATC/OP All Modifications and AQR 12.5]

- b. The Permittee shall limit the throughput of individual tanks to the amounts in Tables III-B-1 and III-B-2, in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-3 (03/29/2004)]*

Loading Racks

- c. The Permittee shall limit the total throughput to the two loading racks and 15 lanes (EU: B01) to 35,379,927 barrels (1,485,956,934 gallons) in any consecutive 12-month period. The loading racks may throughput all grades of gasoline, diesel fuel, Jet fuel, transmix, biodiesel, aviation gasoline, additives and denatured alcohol. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004)]*
- d. The Permittee shall limit the total throughput of gasoline to the two loading racks and 15 lanes (EU: B01) to 23,268,531 barrels (977,278,302 gallons) in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004)]*

Offloading Rack

- e. The Permittee shall limit total throughput of the B-100 off loading rack (EU: B01A) to 147,168,000 gallons in any consecutive 12-month period. *[AQR 12.4.3.1(e)(10) and AQR 12.5.2(a)]*

Loading Racks: Auxiliary Flare

- f. The Permittee shall limit operation of the auxiliary flare (EU: B10) to 438 hours in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-4 (03/29/2004)]*

Ethanol Unloading System

- g. The Permittee shall limit the amount of ethanol unloaded through the ethanol loading system (EU: H9) to 76,104,000 gallons in any consecutive 12-month period. *[NSR ATC 13, Modification 21, Condition IV-2-b (08/31/2010)]*

Haul Roads

- h. The haul road trips (EU: E01) shall not exceed 173,375 trips in any consecutive 12-month period. The haul road distance shall not exceed one-half mile round trip. *[AQR 12.5.2.6(a)]*

Service Roads

- i. The Vehicle Miles Traveled (VMT) on unpaved service roads (EU: H01) shall not exceed 6,368 miles in any consecutive 12-month period. *[AQR 12.4.3.1(e)(10) and AQR 12.5.2(a)]*

Diesel Fire Pump

- j. The Permittee shall limit operation of the diesel fire pump (EU: D02) for testing and maintenance purposes to 120 hours in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-4 (03/29/2004)]*

Provers

- k. The Permittee shall limit the number of service events of each Fuel Flow Meter Prover (EUs: P1 and P2) to 12 in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 18 Rev 1, Condition IV-A-8 (04/10/2008)]*
- l. The Permittee shall limit the petroleum product volume replaced during each service event for the Fuel Flow Meter Prover (EU: P1) to 942 gallons. *[NSR ATC/OP 13, Modification 18 Rev 1, Condition IV-A-8 (04/10/2008)]*

- m. The Permittee shall limit the petroleum product volume replaced during each service event for the Fuel Flow Meter Prover (EU: P2) to 844 gallons. *[NSR ATC/OP 13, Modification 18 Rev 1, Condition IV-A-8 (04/10/2008)]*

Diesel Engine for Air Compressor (EU: B11)

- n. The Permittee shall limit operation of the diesel engine for air compressor to 96 hours per year. *[Title V Revision Application April 22, 2014]*

3. Emission Controls

General Requirements

- a. The Permittee shall comply with all applicable control requirements of 40 CFR 60, Subparts A, K, Kb, and XX; 40 CFR Part 80; and 40 CFR Part 63, Subpart BBBB. *[NSR ATC/OP 13, Modification 6, Condition III-A-1 (03/29/2004)]*

Storage Tanks

- b. The Permittee is subject to Subpart K and therefore required to store petroleum liquids in accordance with the emission standards for storage vessels (EUs: A01 through A12, A14, A15 and A29) by equipping them with floating roofs, a vapor recovery system, or their equivalents. These petroleum storage vessels have been identified as being constructed and permitted between 1973 and 1978 and are therefore subject to the requirements of 40 CFR 60, Subpart K. *(This requirement has been met by the Permittee by installing and maintain floating roofs on each unit in accordance with 40 CFR 60.112) [40 CFR 60, Subpart K and AQR 12.5.2.6.d]*
- c. The Permittee is subject to 40 CFR 60, Subpart Kb for Tank 541 (EU: A12) when the storage tank is used for products with a true vapor pressure greater than 3.5 kPa (0.5 psia). *[40 CFR 60.110b(b), AQR 12.4.3.1(e)(10) and AQR 12.5.2.6(a) & (b)]*
- d. The Permittee shall limit the Reid Vapor Pressure (RVP) of all combined fuel products stored in each emission unit listed in Table III-B-1 to an annual average RVP 11. The 12-month rolling average RVP limit will not apply to a storage tank that is not in service for any consecutive 12 months. *[NSR ATC/OP 13, Modification 6, Condition III-B-18, (03/29/2004)]*
- e. The Permittee shall limit each storage tank to the product(s) as noted for each tank in Tables III-B-1 and III-B-2. *[NSR ATC/OP 13, Modification 6, Condition III-B-17 (03/29/2004)]*
- f. The Permittee shall maintain the access hatches on (EU: G02), a 250 gallon AST with fixed roof, in a closed position at all times when the access hatches are not in use. *[40 CFR 63.11087(a) Table 1]*
- g. The Permittee shall maintain and operate the fuel storage tanks and the fuel additive tanks according to the control requirements as listed in Table III-B-9. *[NSR ATC/OP 13, Modification 6 (03/29/2004)]*

Table III-B-9: Tank Control Requirements

EU	Facility ID	Control Requirements
A01	530	External Floating Roof with primary and secondary seals
A02	531	External Floating Roof with primary and secondary seals
A03	532	External Floating Roof with primary and secondary seals
A04	533	External Floating Roof with primary and secondary seals
A05	534	External Floating Roof with primary and secondary seals
A06	535	External Floating Roof with primary and secondary seals

EU	Facility ID	Control Requirements
A07	536	External Floating Roof with primary and secondary seals
A08	537	External Floating Roof with primary and secondary seals
A09	538	External Floating Roof with primary and secondary seals
A10	539	External Floating Roof with primary and secondary seals
A11	540	Internal Floating Roof with primary and secondary seals
A12	541	Domed External Floating Roof with primary and secondary seals
A13	524	Internal Floating Roof with primary and secondary seals
A14	542	Internal Floating Roof, Primary and Secondary Seals
A15	543	Internal Floating Roof, primary seals
A16	545	Internal Floating Roof with primary and secondary seals
A17	546	Internal Floating Roof, with primary and secondary seals
A18	522	Internal Floating Roof, with primary and secondary seals
A19	525	Fixed Roof
A20	526	Fixed Roof
A21	547	Internal Floating Roof with primary and secondary seals
A22	512	Fixed Roof
A23	510	External Floating Roof, Primary Seals
A24	511	External Floating Roof, Primary Seals
A25	---	Fixed Roof
A26	500 A	Cone Roof, Internal Floating Roof
A27	501	Internal Floating Roof, Secondary Seals
A28	523	Internal Floating Roof with primary and secondary seals
A29	544	Internal Floating Roof with primary and secondary seals
A30	533 A	Fixed Roof
A31	537 A	Fixed Roof
A32	541 A	Fixed Roof
A33	541 B	Fixed Roof
A34	LV-TK-0005	Fixed Roof
A35	Amoco	Fixed Roof
A36	Shell	Fixed Roof
A37	Diesel Dye	Fixed Roof
A38	537 B	Fixed Roof
A39	Additive M-1	Fixed Roof
A45	548	Domed External Floating Roof with primary and secondary seals
A46	549	Domed External Floating Roof with primary and secondary seals
A47	550	Internal Floating Roof with primary and secondary seals
A48	551	Internal Floating Roof with primary and secondary seals
A49	LV-TK 0006	Fixed Roof
A53	EXX-2	Fixed Roof
A54	Tex-1	Fixed Roof
A55	476	Fixed Roof
A56	513	Internal Floating Roof with primary and secondary seals
A57	514	Internal Floating Roof, with primary and secondary seals
A58	553	Internal Floating Roof with primary and secondary seals
A59	554	Internal Floating Roof with primary and secondary seals
A60	555	Internal Floating Roof with primary and secondary seals
A61	552	Internal Floating Roof with primary and secondary seals
B04	500	Internal Floating Roof with primary and secondary seals
B05	521	Internal Floating Roof with primary and secondary seals
D01	DG	Fixed Roof
H02	Mainline sump	Fixed roof UST with vent
H03	Rack sump	Fixed roof UST with vent
H04	New Mainline	Fixed roof UST with vent

EU	Facility ID	Control Requirements
	sump	
H06	Nellis sump	Fixed roof UST with vent
H07	Rack sump	Fixed roof UST with vent
H08	QC sump	Fixed roof UST with vent
H10	Tank 500B	AST VFR tank
H11	OWS tank	AST Tank with P/V valves and Carbon adsorption unit with 95% control efficiency
H12	OST-1200-DW	Dual wall HFR AST. Tank with P/V valves and Carbon adsorption unit with 95% control efficiency
H14	ASA Tote	Rectangular AST, fixed roof
H15	CI Tote	Rectangular AST, fixed roof
H16	Lane 7 Red Dye Tote	Rectangular AST, fixed roof

Sump Tanks, Oil Water Separator, and Oil Storage Tank

- h. The Permittee shall control the vapors from the OWS (EU: H11) and the oil storage tank (EU: H12) by venting the vapors to a carbon adsorption system that has a minimum control efficiency of 95.0 percent. *[NSR ATC 13, Modification 21, Condition IV-B-5 (08/30/2010)]*
- i. The Permittee shall keep all hatches and other openings on the OWS (EU: H11) and the oil storage tank (EU: H12) gasketed and closed at all times except when opened for active inspection, maintenance, sampling, gauging or repair. *[NSR ATC 13, Modification 21, Condition IV-B-6 (08/30/2010)]*
- j. The Permittee shall operate and maintain all vents on the OWS (EU: H11) and the oil storage tank (EU: H12) with pressure/vacuum relief valves. The vents on the sumps (EUs: H02, H03, H04, H06, H07 and H08) are not required to be equipped with pressure/vacuum relief valves. *[NSR ATC 13, Modification 21, Condition IV-B-7 (08/30/2010)]*

Loading Racks: Vapor Recovery Unit

- k. The Permittee shall use as the primary control device the John Zink Series 2000 high efficiency Adsorption-Absorption Hydrocarbon Vapor Recovery Unit (JZVRU) (EU: B02) for all captured VOC loading rack emissions. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004) and 40 CFR 60, Subpart XX]*
- l. The Permittee shall operate the JZVRU (EU: B02) during all product loading unless there is a documented malfunction, documented emergency or maintenance event with the JZVRU. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004) and 40 CFR 60, Subpart XX]*
- m. The Permittee shall maintain and operate the vapor collection and liquid loading equipment to limit gauge pressure in the delivery tank to 4,500 Pascal (450 mm of water) during product loading. The pressure shall be measured by the procedures specified in 40 CFR §60.503(d). *[40 CFR 60.502(h) and NSR ATC/OP 13, Modification 6, Condition III-A-6 (03/29/2004)]*
- n. The Permittee shall maintain and operate the vapor collection system such that the pressure vacuum vents do not open if the system pressure is less than 4,500 Pascal (450 mm of water). *[40 CFR 60.502(i) and NSR ATC/OP 13, Modification 6, Condition III-A-7 (03/29/2004)]*
- o. The Permittee shall maintain and operate the JZVRU (EU: B02) per manufacturer's specifications. *[NSR ATC/OP 13, Modification 6, Condition III-E-3 (03/29/04)]*

Loading Racks: Auxiliary Flare

- p. The Permittee shall use the Flare Industry auxiliary flare (EU: B10) at all times the JZVRU is inoperable to control VOC loading rack emissions. The Flare Industry flare shall operate only during documented malfunction, documented emergencies or maintenance events of the JZVRU (EU: B02). *[NSR ATC/OP 13, Modification 6, Condition III-A-3 (03/29/2004)]*
- q. The Permittee shall operate the flare (EU: B10) such that it utilizes a flame scanner/sensor and immediately shuts down operations if instability of the flame is detected. Only trucks loading prior to the flare shutdown shall be allowed to finish product loading and only if vapor holder capacity exists. Once the Permittee has determined, documented, and repaired the cause of the flame instability, product loading of tanker trucks may resume utilizing the flare as the control device. *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*

Loading Racks: Tanker Loading Requirements

- r. The Permittee shall take steps to assure that any non-vapor tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. *[40 CFR 60.502(e)(5) and NSR ATC/OP 13, Modification 6, Condition III-A-8 (03/29/2004)]*
- s. The Permittee shall only load gasoline into tank trucks that are equipped with vapor collection equipment compatible with the terminal's vapor collection system. *[40 CFR 60.502(f) and NSR ATC/OP 13, Modification 6, Condition III-A-9 (03/29/2004)]*
- t. The Permittee shall only load tank trucks when the terminals and the tank truck's vapor collection systems are connected during each loading. *[40 CFR 60.502(g) and NSR ATC/OP 13, Modification 6, Condition III-B-9 (03/29/2004)]*
- u. The Permittee shall follow all regulatory requirements related to fuel handling to minimize vapor releases to the atmosphere. *[NSR ATC/OP 13, Modification 6, Condition III-B-16 (03/29/2004)]*
- v. The Permittee shall take, but is not limited to, the following measures to minimize vapor releases to the atmosphere: *[NSR ATC/OP 13, Modification 6, Condition III-B-16 (03/29/2004)]*
 - i. minimize gasoline spills;
 - ii. clean up spills as expeditiously as possible;
 - iii. cover all open gasoline containers with a gasketed seal when not in use; and
 - iv. minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

Ethanol Unloading System

- w. The Permittee shall vent the vapors from the ethanol unloading system (EU: H09) to the existing VRU, EU: B02. *[NSR ATC 13, Modification 21, Condition IV-B-4 (08/30/2010)]*

Offloading Rack B-100 Fuel

- x. The Permittee shall ensure that only trucks with current certification of vapor tightness shall be offloaded from the B-100 Offloading Rack (EU: B01A). *[AQR 12.4.3.1(e)(10) and AQR 12.5.2.6(a) & (b)]*
- y. The Permittee shall only offload B-100 from tank trucks that are equipped with a vapor recovery system compatible with the terminal's vapor balance system (EU: B01A). *[AQR 12.4.3.1(e)(10) and AQR 12.5.2.6(a) & (b)]*

- z. The Permittee shall only offload B-100 from tank trucks (EU: B01A) when all vapor balance system equipment is connected and in operation. *[AQR 12.4.3.1(e)(10) and AQR 12.5.2.6(a) & (b)]*

Paved and Unpaved Haul Roads and Service Roads

- aa. The Permittee shall sweep and/or rinse paved roads (EUs: E01 and H01) as necessary to remove all observable deposits and so as not to exhibit opacity greater than 20 percent for a period or periods totaling more than six minutes in any 60 minute period. *[NSR ATC/OP 13, Modification 6, Condition III-A-27 (03/29/2004)]*
- bb. The Permittee shall treat unpaved roads (EUs: E01 and H01) accessing or located on the site with chemical or organic dust suppressant and water as necessary so as not to exhibit an opacity greater than 20 percent for a period or periods totaling more than six minutes in any 60 minute period. *[NSR ATC/OP 13, Modification 6, Condition III-A-28 (03/29/2004)]*
- cc. The Permittee shall not exceed silt content of six percent and silt loading of 0.33 ounces per square foot in paved and unpaved road debris, regardless of the average number of vehicles per day. *[NSR ATC/OP 13, Modification 6, Condition III-A-28 (03/29/2004)]*

Soil and Groundwater Vapor Extraction Unit

- dd. The Permittee shall use only propane as the auxiliary fuel used in the soil and groundwater vapor extraction system (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*
- ee. The Permittee shall operate and maintain the soil and groundwater vapor extraction system (EU: SR04) according to the manufacturer's guidelines. *[NSR ATC/OP 13, Modification 6, Condition III-A-7 (03/29/2004)]*
- ff. At VOC concentrations greater than 3,000 ppm, the Permittee shall operate a thermal oxidizer capable of 98.5 percent VOC destruction to control all emissions from the vapor extraction system (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-23 (03/29/2004)]*
- gg. At VOC concentrations between 3,000 ppmv and 1,000 ppmv, the Permittee shall operate a catalytic oxidizer with a minimum 98 percent destruction efficiency for VOC. *[NSR ATC/OP 13, Modification 6, Condition III-A-24 (03/29/2004)]*
- hh. At VOC concentrations below 1,000 ppmv, catalytic oxidation shall be used, and emissions shall not exceed the limitations in Table III-B-8 irrespective of the control efficiency. *[NSR ATC/OP 13, Modification 6, Condition III-A-26 (03/29/04)]*
- ii. The Permittee shall maintain the control device's combustion temperature at or above 1,450°F during thermal oxidation mode, and its operating temperature at or above 700°F during catalytic oxidation mode. *[NSR ATC/OP 13, Modification 6, Condition III-A-19 (03/29/2004)]*

Cooling Tower (EU: H05)

- jj. The Permittee shall equip the Baltimore Aircoil Cooling Tower (EU: H05) with drift eliminators with a maximum drift rate of 0.001 percent. *[NSR ATC 13, Modification 21, Condition IV-B-1 (08/30/2010)]*
- kk. The Permittee shall not allow the TDS of the cooling tower (EU: H05) to exceed 2,000 ppm. *[NSR ATC 13, Modification 21, Condition IV-B-2 (08/30/2010)]*
- ll. The Permittee shall operate and maintain the cooling tower (EU: H05) in accordance with the manufacturer's specifications. *[NSR ATC 13, Modification 21, Condition IV-B-3 (08/30/2010)]*

Parts Washer (EU: H13)

- mm. The Permittee shall keep the cover closed on the solvent tub of the parts washer at all times when not in use. [AQR 12.5.2.6(a)]
- nn. The Permittee shall not allow the parts washer spray nozzle to operate unless the unit is being used to wash parts. [AQR 12.5.2.6(a)]
- oo. The Permittee shall operate and maintain the parts washer in accordance with the manufacturer's specifications. [AQR 12.5.2.6(a)]
- pp. The Permittee shall act to minimize solvent spills at all times. [AQR 12.5.2.6(a)]
- qq. The Permittee shall keep any solvent soaked rags or other waste products containing solvent in closed, labeled containers. [AQR 12.5.2.6(a)]

Diesel Engine for Air Compressor (EU: B11)

- rr. The Permittee shall operate and maintain each the diesel engine in accordance with the manufacturer's specifications. [AQR 12.5.2.6(a)]
- ss. The Permittee shall maintain the diesel engine as follows, unless the manufacturer's specifications are more stringent: [40 CFR 63, Subpart 63.6603]
 - a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
 - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (The Permittee may utilize an oil analysis program as described in Subpart 63.6625(i) in order to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.)
- tt. During periods of startup, the Permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR 63.6603(a)]

C. Monitoring

General [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

- 1. The Permittee shall comply with all applicable requirements of 40 CFR 60, Subparts A, K, Kb and XX, 40 CFR 80, and 40 CFR 63, Subpart BBBB. [NSR ATC/OP 13, Modification 6, Condition III-E-1 (03/29/2004)]
- 2. The Permittee shall conduct a daily visual emissions check for visible emissions from emissions units while they are in operation (EUs: D02, E01 and H01). [AQR 12.5.2.6(d)]
- 3. If the Permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation. [AQR 12.5.2.6(d)]
- 4. If the Permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the Permittee shall: [AQR 12.5.2.6(d)]

- a. take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; or
 - b. if practical, have a certified VE observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR 60, Appendix A: Reference Method 9.
5. Visible emissions checks do not require a certified VE observer, except where visible emissions appear to exceed the allowable opacity limit, and an EPA Method 9 observation is made to establish it does not exceed the standard. *[AQR 12.5.2.6(d)]*

Storage Tanks *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

6. The Permittee shall monitor the volume of throughput to each tank, including sumps and additives, in either gallon or barrels, and calculate monthly the combined annual throughput in any consecutive 12-month period.
7. The Permittee shall monitor the RVP of fuel products by sampling monthly at their respective tanks, and calculate monthly the RVP of all combined fuel products in any consecutive 12-month period. The consecutive 12-month period RVP limit will not apply to a storage tank that is not in service for consecutive 12 months.
8. The Permittee shall monitor the fuel type serviced by each multifuel tank, to ascertain their requirements with respect to rule applicability, by documenting the corresponding service dates of all fuel types and vapor pressures of all gasoline products.
9. The Permittee shall conduct visual inspections of the internal floating roof, the primary seal, and the secondary seal as required by 40 CFR 60.113b(a)(1)&(2) for each applicable storage vessel (EUs: A11 through A18, A21, A27 through A29, A45 through A48, A56 through A61, B04 and B05). Inspections shall be conducted according to the following frequency:
 - a. Initial inspections shall be conducted prior to filling the vessel with a volatile organic liquid; and
 - b. Subsequent visual inspections through manholes and roof hatches shall be conducted on or before 12 months from the previous inspection.
10. Upon finding that an internal floating roof is not resting on the surface of the liquid inside the storage vessel, or there is liquid accumulated on a roof, or a seal is detached, or there are holes or tears in a seal fabric, or there are other openings in a seal of an applicable storage vessel (EUs: A11 through A18, A21, A27 through A29, A45 through A48, A56 through A61, B04 and B05), the Permittee shall repair the items within 45 days or before filling, or the Permittee shall empty and remove the storage vessel from service within 45 days. *[40 CFR 60 Subpart Kb and AQR 12.5.2.6(d)]*
11. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals as required by 40 CFR §60.113b(a)(4) for each applicable storage vessel (EUs: A11 through A18, A21, A27 through A29, A45 through A48, A56 through A61, B04 and B05) each time the storage vessel is emptied and degassed, and at intervals no greater than 10 years. *[40 CFR 60, Subpart Kb and AQR 12.5.2.6(d)]*
12. The Permittee shall determine the gap areas and maximum gap widths for each applicable storage vessel with an external floating roof (EUs: A01 through A10, A23 and A24) as required by 40 CFR 60.113(b)(1)). Measures shall be between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel.

Measures shall be taken according to the following frequency: *[40 CFR Part 60.113(b)(1) and AQR 12.4.3.1(a)(9)]*

- a. Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with a volatile organic liquid and at least once every 5 years thereafter.
 - b. Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with a volatile organic liquid and at least once per year thereafter.
 - c. If the Permittee ceases to store a volatile organic compound for a period of 1 year or more, subsequent introduction of a volatile organic compound into the vessel shall be considered an initial fill for the purposes of conditions 12(a) and 12(b) of this section.
13. The Permittee shall make necessary repairs or empty the storage vessel with an applicable external floating roof (EUs: A01 through A10, A23 and A24) within 45 days of identification in any inspection for seals not meeting the requirements as follows: *[40 CFR Part 60.113(b)(4) and AQR 12.4.3.1(a)(9)]*
- a. The accumulated area of gaps between the tank wall and the mechanical shoe or liquid mounted primary seal shall not exceed 212 Cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm.
 - b. One end of the mechanical shoe shall extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm above the stored liquid surface.
 - c. The secondary seal shall be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in paragraph 60.113b(b)(2)(iii) of subpart Kb.
 - d. The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm.
 - e. There shall be no holes, tears, or other openings in the shoes, seals or seal fabrics.
14. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel. *[40 CFR 60, Subpart Kb]*

Oil Water Separator and Oil Storage Tank *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

15. The Permittee shall monitor weekly VOC concentrations at the inlet and outlet of the carbon adsorber system (EUs: H11 and H12) to determine its control efficiency. *[NSR ATC 13, Modification 21, Condition IV-C-2 (08/30/2010)]*
16. The Permittee shall utilize a Photoionization Detector (PID) for weekly VOC monitoring. The control efficiency of the carbon absorber shall be calculated as equal to one (1) minus the VOC outlet concentration measured by the PID divided by the VOC inlet concentration measured by the PID or FID (EUs: H11 and H12). *[NSR ATC 13, Modification 21, Condition IV-C-3 (08/30/2010)]*
17. The Permittee shall maintain and calibrate the PID unit according to the manufacturer's recommendations for calibration and quality control. *[NSR ATC 13, Modification 21, Condition IV-C-4 (08/30/2010)]*

Loading Racks [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

18. The Permittee shall monitor the volume of throughput of all products to the loading racks in either gallons or barrels (EU: B01), and calculate monthly the annual throughput as a 12-month rolling total.
19. The Permittee shall monitor the volume of gasoline throughput to the loading racks in either gallons or barrels (EU: B01), and calculate monthly the combined annual gasoline throughput in any consecutive 12-month period.
20. The Permittee shall, at least once per day, inspect all loading lanes and review all normal operations. The loading lane inspections will include but not be limited to inspecting all check valves, flanges, hoses, and loading arms. Review of all normal operations will include a walk through. Detection methods incorporating sight, sound, or smell are acceptable. A detection of a leak shall be recorded and the source of the leak repaired within five calendar days after it is detected. *[NSR ATC/OP 13, Modification 6, Condition III-E-4 (03/29/2004)]*
21. The Permittee shall, for each calendar month, conduct inspections of the vapor collection system, the vapor processing system and each loading rack handling gasoline during the loading of gasoline tank trucks for total organic compounds liquids or vapor leaks. Detection methods incorporating sight, sound and smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. *[40 CFR 60.502(j) and NSR ATC/OP 13, Modification 6, Condition III-B-11 (03/29/2004)]*
22. Delay of repair of any leaking equipment will be allowed upon a demonstration to the Control Officer that repairs within five days are not feasible. The Permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. *[NSR ATC/OP 13, Modification 6, Conditions III-E-5, 6, and 7 (03/29/04)]*
23. The Permittee shall limit the loading of liquid product into gasoline tank trucks to vapor tight gasoline tank trucks using the following procedures: *[NSR ATC/OP 13, Modification 6, Condition III-E-11 (03/29/2004)]*
 - a. The Permittee shall issue all tank truck drivers a driver identification card. No product can be loaded from any loading lane without a valid driver identification card and pin number. Upon visiting the terminal for the first time, the driver will present the operation staff with a valid driver's license, customer authorization letter, and current tank truck vapor tightness certification. All the information required under 40 CFR §60.505(b) will be entered into the Permittee's data system. The expiration date for the truck vapor tightness certification will be recorded in the Permittee's data system. The truck's vapor tightness expiration date can be no more than one year from the date of the issuance of the vapor tightness certificate.
 - b. The Permittee shall scan all tank truck driver identification cards by the Permittee's data system, and enter the truck and trailer numbers before product can be loaded at the terminal. If the tank truck vapor tightness certificate has expired, the driver will be unable to load product and will be instructed to see the operator on duty. In order to load the truck in question, the driver must present the operator with a new vapor tightness certificate, which will then be entered into the data system. If the driver does not have an updated vapor tightness certificate, the truck cannot load until a new certificate can be presented.

Loading Racks: Vapor Recovery Unit, (EU: B02) [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

24. The Permittee shall operate and maintain a non-dispersive infrared (NDIR) analyzer on the JZVRU (EU: B02) as CEMS to monitor VOC emissions from the exhaust of the on-line carbon bed. Emission readings shall be recorded and stored in a data acquisition system

- compatible with the analyzer. *[NSR ATC/OP 13, Modification 6, Condition III-A-4 (03/29/2004)]*
25. The Permittee shall operate and maintain the CEMS in conformance with all provisions of 40 CFR Part 60.13. *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
 26. The Permittee shall demonstrate compliance with fuel dispensing operational and emission limitations specified in this permit by monitoring the following parameters of the JZVRU (EU: B02): *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
 - a. exhaust gas flow rate;
 - b. hourly VOC concentration from the exhaust gas in lbs/1,000 gallons of petroleum loaded and mg/L of petroleum loaded;
 - c. four-hour average VOC concentration from the exhaust gas in lbs/1,000 gallons of petroleum loaded and mg/L of petroleum loaded; and
 - d. continuous product dispensing in gallons and liters.
 27. Any exceedance of the four-hour average or annual VOC emission limitations as determined by the CEMS, shall be considered a violation of the emission limit imposed and may result in enforcement action. *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
 28. The Permittee shall obtain an approved quality assurance plan for all CEMS required by this Section. The quality assurance plan which was approved by Air Quality on September 7, 2011, shall be in compliance with 40 CFR 60, Appendix F – Quality Assurance Procedures, and contain auditing schedules, reporting schedules, and design specifications for the CEMS system. *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
 29. The Permittee is required to conduct a RATA on an annual basis for all affected emission units to demonstrate compliance with the CEM requirements. The Permittee is subject to 40 CFR 60, Appendix E and Appendix F, and Air Quality guidelines on source testing. *[NSR ATC/OP 13, Modification 6, Condition III-F-7 (03/29/2004)]*
 30. The Permittee shall submit in writing all RATA protocols to the Control Officer for approval no less than 45 days before the proposed date for the audit.
 31. The Permittee shall submit the results of the RATA to the Control Officer within 60 days of the conclusion of the audit.
 32. The Permittee shall perform preventative daily, weekly, quarterly, and annual maintenance protocols on the JZVRU (EU: B02) in accordance with John Zink Company guidelines.
 33. The Permittee shall sample the glycol solution from the JZVRU separator (EU: B02) on an annual basis. The glycol sample shall be tested for pH and glycol content. The pH of the glycol solution must meet or be adjustable to manufacturer's specifications. The glycol content must be in a concentration of 50 percent or greater. If either of these conditions cannot be met, the glycol solution must be replaced. *[NSR ATC/OP 13, Modification 6, Condition III-E-8 (03/29/2004)]*

Loading Racks: Auxiliary Flare *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

34. The Permittee shall monitor the hours of operation of the Flare Industry flare unit (EU: B10), and calculate monthly the annual operating hours in any consecutive 12-month period.
35. The Permittee shall monitor flame instability with an optical scanner/sensor fitted on the Flare Industry flare unit (EU: B10) that will continuously verify the presence of a flame while in operation. If flame instability is detected by the scanner/sensor the flare unit shall be operated

and maintained to immediately shut down operations. *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*

36. The Permittee will visually inspect the flame quality during operation of the flare unit (EU: B10) upon start up and once every two hours thereafter. The Permittee will document the date and time of each observation. If the flame is observed to be anything but clear blue, the Permittee will increase visual inspections and perform any corrective actions as dictated by the facility operating manual. *[NSR ATC/OP 13, Modification 6, Condition III-E-9 (03/29/2004)]*
37. The Permittee shall test the saturator tank fluid on the flare unit (EU: B10) monthly, and at the conclusion of any flare use in excess of 24 hours cumulative operation. The testing will consist of taking a representative sample from the saturator tank and analyzing the sample for API gravity and vapor pressure. The fluid must be replaced if the analysis determines the API gravity to be less than 47 degrees or if the analysis determines the Reid vapor pressure to be less than four psia. *[NSR ATC/OP 13, Modification 6, Condition III-E-10, (03/29/2004)]*
38. The Permittee shall operate and maintain the flare unit (EU: B10) per manufacturer's specifications. *[NSR ATC/OP 13, Modification 6, Condition III-E-3 (03/29/04)]*

Ethanol Unloading System *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

39. The Permittee shall monitor the volume of ethanol throughput to the unloading system in gallons (EU: H9), and calculate monthly the annual throughput as a 12-month rolling total.

Haul Roads *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

40. The Permittee shall monitor the number of tank trucks entering into the loading racks for the loading of product (EU: E01), and calculate monthly the annual number of trips as a 12-month rolling total.

Service Roads *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

41. The Permittee shall monitor the number of vehicle miles traveled on unpaved roads for vehicles traveling onsite for operational and maintenance purposes (EU: H1), and calculate monthly the annual vehicle miles traveled as a 12-month rolling total.

Soil and Groundwater Vapor Extraction Unit *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

42. The Permittee shall operate and maintain a continuous flow monitor on the Soil and Groundwater Vapor Extraction Unit (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-E-12 (03/29/2004)]*
43. The Permittee shall operate and maintain a continuous combustion chamber temperature monitor on the control device for the Soil and Groundwater Vapor Extraction Unit (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-19 (03/29/2004)]*
44. The Permittee shall cease operation of the Soil and Groundwater Vapor Extraction Unit (EU: SR04) if the continuous combustion chamber temperature monitor malfunctions or shuts down. *[NSR ATC/OP 13, Modification 6, Condition III-A-21 (03/29/2004)]*
45. The Permittee shall demonstrate compliance with remediation operational and emission limitations specified in this permit by monitoring the following parameters of the Soil and Groundwater Vapor Extraction Unit (EU: SR04): *[NSR ATC/OP 13, Modification 6, Condition III-E-12 (03/29/2004)]*
 - a. hours of operation;
 - b. continuous exhaust gas flow rate;
 - c. continuous combustion chamber temperature; and

- d. hourly and quarterly accumulated mass emissions of VOC based on daily activities and monitoring data.
46. The Permittee shall monitor weekly VOC concentrations at the inlet and outlet of the control devices (EU: SR04) to determine emission rates and their control efficiency for each mode of operation when VOC concentrations are above 1,000 ppmv. *[NSR ATC/OP 13, Modification 6, Conditions III-A-25 and III-E-13 (03/29/2004)]*
 47. The Permittee shall utilize a photoionization detector (PID) for weekly VOC monitoring. *[NSR ATC/OP 13, Modification 6, Condition III-E-13 (03/29/2004)]*
 48. The Permittee shall maintain the PID unit according to the manufacturer's recommendations for calibration and quality control. *[NSR ATC/OP 13, Modification 6, Condition III-E-15 (03/29/2004)]*
 49. The Permittee shall collect air samples every two months to determine the concentration of VOC sent to the control devices and the emissions to the atmosphere. The samples shall be analyzed, at minimum, for total petroleum hydrocarbons (TPH) by EPA Method 8015M (as modified for air use) and for benzene, toluene, ethylbenzene and meta, para, ortho-xylene and methyl tert-butyl ether (MTBE) by Method 8260 (as modified for air use) and for water vapor content. *[NSR ATC/OP 13, Modification 6, Condition III-E-14 (03/29/2004)]*
 50. The Permittee shall monitor the total flow rate (scfm) of the vapor stream to the control device with each sample collected. *[NSR ATC/OP 13, Modification 6, Condition III-E-16, (03/29/2004)]*
 51. The Permittee shall monitor monthly the auxiliary fuel used by each oxidizer on the vapor extraction unit in standard cubic feet (EU: SR04).
 52. The Permittee shall conduct a daily visual inspection of the remediation unit for smoke. If the unit exhibits black or white smoke at any time, the unit shall be shut down until the cause is determined and repaired. *[NSR ATC/OP 13, Modification 6, Condition III-E-17 (03/29/2004)]*

Diesel Fire Pump *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

53. The Permittee shall operate the fire pump (EU: D02) with a nonresettable hour meter.
54. The Permittee shall monitor the hours of operation of the fire pump (EU: D02), and calculate monthly the annual hours of operation for testing and maintenance, and separately for emergencies, in any consecutive 12-month period.

Diesel Engine for Air Compressor (EU: B11) *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

55. The Permittee shall operate the engine with a nonresettable hour meter, monitor the duration of operation and calculate monthly the annual hours of operation totals in any consecutive 12-month period.

Provers *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*

56. The Permittee shall monitor the number of service events on each fuel flow meter prover (EUs: P01 and P02), and calculate monthly the annual number of events in any consecutive 12-month period.
57. The Permittee shall monitor the volume of petroleum product replaced during each service of the fuel flow meter prover in gallons (EUs: P01 and P02), and calculate monthly the annual volume of petroleum product replaced in any consecutive 12-month period.

Cooling Tower [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

58. The Permittee shall sample the TDS content of the cooling tower circulation water monthly by the use of a conductivity meter (EU: H05).

Parts Washer [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

59. The Permittee shall conduct a weekly visual leak check on all hoses and piping connections while the emission unit is in operation and while not in operation (EU: H13).

D. Testing

General [AQR 12.5.2.6]

1. The Permittee shall comply with all applicable testing requirements in 40 CFR 60, Subparts A, K, Kb, XX, 40 CFR 80, and 40 CFR 63, Subpart BBBBBB.
2. The Permittee is subject to 40 CFR Part 60, Subpart A, Appendix A (as amended) and Air Quality guidelines on performance testing. Performance testing shall be for determining compliance with emission limitations set forth in this Part 70 OP and all related and/or relevant 40 CFR Part 60 and 63 subparts. The Permittee shall submit in writing all performance testing protocols to the Control Officer for approval no less than 45 days before the proposed date for the performance tests.
3. The Permittee shall submit the results of the performance tests to the Control Officer within 60 days of the conclusion of the performance tests.

Loading Racks: Vapor Recovery Unit, (EU: B02) [AQR 12.5.2.6]

4. The Permittee shall conduct subsequent performance tests on the JZVRU (EU: B02) on or before the fifth anniversary date of the previous performance test.
5. The Permittee is subject to the applicable performance testing requirements of 40 CFR Part 60 Subpart XX §60.503 for the JZVRU (EU: B02). *[40 CFR 60, Subpart XX]*
6. The Permittee shall, immediately before the performance test on the JZVRU (EU: B02), use EPA Method 21 to monitor for leakage of vapor at all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. *[NSR ATC/OP 13, Modification 6, Condition III-F-5 (03/29/2004)]*
7. The performance test shall be six hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete six-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the six-hour period in which the highest throughput normally occurs. *[40 CFR 60.503(b), 40 CFR 60.503(b)(1), and NSR ATC/OP 13, Modification 6, Condition III-F-6 (03/29/2004)]*
8. The Permittee shall utilize performance testing methodologies for the JZVRU (EU: B02) as indicated in Table III-D-1:

Table III-D-1: Performance Testing Methods for (EU: B02)

Test Criteria	EPA Test Method
Determination of VOC Leaks (pre-test)	Method 21
Stack parameters	Methods 1 through 4
Combustion vapor processing system	Method 2B

Test Criteria	EPA Test Method
All other vapor processing systems	Method 2A
Determination of total organic compound concentrations	Method 25A or 25B or 18

Soil and Groundwater Vapor Extraction Unit (EU: SR04) [AQR 12.5.2.6]

9. The Permittee shall performance test the Soil and Groundwater Vapor Extraction Unit (EU: SR04) to demonstrate compliance with control efficiencies and emission rates.
10. The Permittee shall conduct subsequent performance tests on the Groundwater Vapor Extraction Unit (EU: SR04) on or before the fifth anniversary date of the previous performance test.
11. The Permittee shall utilize performance testing methodologies for the Soil and Groundwater Vapor Extraction Unit (EU: SR04) as indicated in Table III-D-2:

Table III-D-2: Performance Testing Methods for (EU: SR04)

Test Criteria	EPA Test Method
Stack parameters	Methods 1 through 4
Determination of total organic compound concentrations	Method 25A

E. Record Keeping

1. The Permittee shall comply with all applicable record keeping requirements of 40 CFR Part 60.7, 40 CFR Part 60, Subparts Kb and XX; and 40 CFR 63, Subparts A, BBBB and ZZZZ. [AQR 12.5.2.6]
2. The Permittee shall maintain records that include, at a minimum, the following information to be kept onsite. Records that shall be included in semiannual reporting are noted: [AQR 12.5.2.6]

Storage Tanks

- a. monthly total throughput of individual tanks and sumps (EUs: A01 through A61, B04, B05, D01, F01, F04, F05, F06, and H02 through H04, H06 through H08, and H10 through H16);
- b. monthly total 12-month throughput of all tanks combined, including additives (EUs: A01 through A61, B04, B05, D01, F01, F04, F05, F06, and H02 through H04, H06 through H08, and H10 through H16); (reported semiannually)
- c. monthly RVP sampled for all fuel products in their respective tanks;
- d. monthly average 12-month RVP of all combined fuel products; (reported semiannually)
- e. records of all fuel-types serviced by each tank with corresponding service dates and gasoline vapor pressures (EUs: A01 through A24, A27 through A29, A45 through A48, A56 through A61, B04, B05, and D01);
- f. records of visual inspections required by Section III-C of this permit on the storage tanks (EUs: A11 through A18, A21, A27 through A29, A45 through A48, A56 through A61, B04, and B05) as follows : [40 CFR Part 60.115b]
 - i. the storage vessel on which the inspection was performed;
 - ii. the date the vessel was inspected; and
 - iii. the observed condition of each component of the control equipment (seals, floating roof, and fittings).

- g. records of measurements of seal gaps required by Section III-C of this permit on applicable storage tanks (EUs: A01 through A10, A23 and A24) as follows:
 - i. the date of measurement;
 - ii. the raw data obtained in the measurement; and
 - iii. the calculations described in 40 CFR 60.113b(b).

Oil Water Separator and Oil Storage Tank

- h. weekly monitoring results and calculated efficiency of the carbon adsorber on the OSW (EUs: H11 and H12); (reported semiannually)

Loading/Offloading Racks

- i. continuous dispensing of all products;
- j. monthly consecutive 12-month period total throughput of all products through the loading racks; (reported semiannually)
- k. monthly consecutive 12-month period total throughput of gasoline through the loading racks; (reported semiannually);
- l. monthly consecutive 12-month period total throughput of B-100 fuel through the offloading racks; (reported semiannually);
- m. daily inspection of loading lanes;
- n. monthly inspections of loading racks, and vapor collection and processing systems;
- o. maintenance and repairs associated with daily and monthly inspections of loading racks and loading lanes;
- p. tanker trucks entered into data system for vapor tightness certification;

Loading Racks: Vapor Recovery Unit

- q. exhaust gas flow rate from the VRU (EU: B02);
- r. hourly VOC concentration from the VRU exhaust gas (EU: B02);
- s. four-hour average VOC concentration from the VRU exhaust gas (EU: B02);
- t. malfunctions, documented emergencies or maintenance events on the VRU including times, dates and corrective actions (EU: B02); (reported semiannually)
- u. five-year vapor leakage monitoring results on the VRU (EU: B02) including corrective actions;
- v. five-year performance testing results on the VRU (EU: B02) including corrective actions;
- w. annual RATA audit results including corrective actions;
- x. daily, weekly, quarterly and annual maintenance of the VRU including dates and corrective actions;
- y. annual glycol solution sampling results;

Loading Racks: Auxiliary Flare

- z. dates and times of operation of the auxiliary flare (EU: B10);
- aa. monthly consecutive 12-month period total hours of operation of the auxiliary flare (EU: B10); (reported semiannually);

- bb. visual inspections of the flame quality on the auxiliary flare (EU: B10) during operation including dates, times and corrective actions;
- cc. maintenance and repairs on the auxiliary flare (EU: B10);
- dd. saturator tank fluid testing results and corrective actions (EU: B10);

Ethanol Unloading System

- ee. monthly consecutive 12-month period total throughput of ethanol through the unloading system; (reported semiannually)

Haul Roads and Service Roads

- ff. daily visual emissions check on haul roads and service roads (EUs: E01 and H01) including dates, observer names, location and results;
- gg. monthly consecutive 12-month period total number of trips of the haul roads (EU: H01); (reported semiannually)
- hh. monthly consecutive 12-month period total vehicle miles traveled on unpaved service roads (EU: E01); (reported semiannually)

Soil and Ground Water Vapor Extraction Unit (EU: SR04)

- ii. continuous hours of operation of the soil and groundwater vapor extraction unit (EU: SR04);
- jj. continuous flow rate of the exhaust gas from the soil and groundwater vapor extraction unit (EU: SR04);
- kk. continuous combustion chamber temperature in the soil and groundwater vapor extraction unit (EU: SR04);
- ll. dates of the mode of operation (i.e. thermal or catalyst) of the vapor extraction unit (EU: SR04);
- mm. weekly PID monitoring results on the vapor extraction unit (EU: SR04) inlet and exhaust vapor streams; (reported semiannually)
- nn. calibration of PID for the vapor extraction unit (EU: SR04);
- oo. maintenance and repair of PID for the vapor extraction unit (EU: SR04);
- pp. bi-monthly sampling results on vapor extraction unit inlet and exhaust vapor streams including total flow rate; (reported semiannually)
- qq. daily visible emissions observation from the vapor extraction unit (EU: SR04);
- rr. maintenance and repair of the vapor extraction unit (EU: SR04) including control devices;
- ss. monthly volume of auxiliary fuel used by each oxidizer on the vapor extraction unit (EU: SR04), in scf;
- tt. hourly accumulated mass emissions of VOC from the vapor extraction unit (EU: SR04);
- uu. quarterly accumulated mass emissions of VOC from the vapor extraction unit (EU: SR04); (report semiannually)

Diesel Engines

- vv. visual emissions check when operating the diesel fire pump engine (EU: D02) and air compressor engine (EU: B11) including dates, observer names, location and results;
- ww. monthly total 12-month hours of operation of the diesel fire pump engine (EU: D02) and air compressor engine (EU: B11); (reported semiannually)

Provers (EUs: P01 and P02)

- xx. monthly total 12-month number of service events of each fuel flow meter prover (EUs: P01 and P02); (reported semiannually);
- yy. monthly total 12-month volume of petroleum product replaced during service events on the fuel flow meter provers (EUs: P01 and P02); (reported semiannually);
- zz. maintenance and/or repairs for each fuel flow meter prover (EUs: P01 and P02);

Cooling Towers

- aaa. monthly TDS content of cooling tower circulation water (EU: H05); and

Parts Washer

- bbb. weekly visual leak checks on the parts washer (EU: H13).

F. Reporting

1. The Permittee shall notify Air Quality when remediation activities have been completed and the soil and groundwater remediation systems are ready to remove from the site. *[NSR ATC/OP 13, Modification 6, Condition III-H-7 (03/29/2004)]*
2. The Permittee shall meet the following reporting requirements after installing any new, reconstructed and modified fixed roof or internal floating roof control equipment: *[40 CFR 60.115b]*
 - a. Submit to the Control Officer a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1);
 - b. Submit to the Control Officer a report within 30 days of the annual visual inspection of internal floating roofs if conditions such as holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both are detected. The report shall include the following:
 - i. identity of the storage vessel;
 - ii. nature of the defects;
 - iii. date the storage vessel was emptied (if applicable); and
 - iv. date the repair was made.
3. The Permittee shall meet the following reporting requirements after installing any new, reconstructed and modified external floating roof control equipment: *[40 CFR 60.115b]*
 - a. Submit to the Control Officer a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(2) and 40 CFR 60.113b(b)(2), (b)(3) and (b)(4);
 - b. Submit to the Control Officer a report within 60 days of performing the seal gap measurements required by 40 CFR 60.113b(b)(1) that includes the following:
 - i. date of measurement;
 - ii. raw data obtained in the measurement;
 - iii. the calculations described in 40 CFR 60.113b(b)(2) and (b)(3); and

- c. Submit to the Control Officer a report within 30 days of a gap measurement that detects gaps exceeding the limitations specified by 40 CFR 60.113b(b)(4). The report shall include the following:
 - i. identity of the storage vessel;
 - ii. date of measurement
 - iii. raw data obtained in the measurement
 - iv. the calculations described in 40 CFR 60.113b(b)(2) and (b)(3);
 - v. date the storage vessel was emptied (if applicable); and
 - vi. date the repair was made.
4. For all the inspections required for applicable storage vessels that have been emptied and degassed, as specified in 40 CFR 60.113b(b), the Permittee shall notify the Control Officer in writing at least 30 days prior to filling or refilling each storage vessel to afford the Administrator the opportunity to inspect the storage vessel prior to refilling. If the inspection required by emptying and degassing a storage vessel is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Control Officer at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Control Officer at least 7 days prior to the refilling. *[40 CFR Part 60.113b (6)(ii) and AQR 12.4.3.1(a)(9)]*
5. The Permittee shall submit semiannual reports to the Control Officer. *[AQR 12.5.2.6(d)]*
6. The Permittee shall make all production, emission and monitoring calculations available to the Control Officer for inspection within 30 days from the end of each month. *[AQR 12.5.2.6(d)]*
7. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d)]*
 - a. The report shall include a summary of each item listed in Condition III-E-2; and
 - b. The report shall be submitted to the Control Officer within 30 calendar days after the end of the reporting period.
8. Regardless of the date of issuance of this Operating Permit, the source shall comply with the schedule for report submissions outlined in Table III-F-1: *[AQR 12.5.2.6(d)]*

Table III-F-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date ¹
Semiannual Report for 1 st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semiannual Report for 2 nd Six-Month Period. Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year

Required Report	Applicable Period	Due Date ¹
Annual Emission Inventory Report	Calendar Year	March 31 each year
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emissions	As Required	Within 24 hours of the Permittee learning of the event
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emissions	As Required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As Required	Submit with semiannual reports
Performance Testing	As Required	Within 60 days from the end of the test

¹If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

9. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. *[AQR 4.4 and AQR 12.5.2.6(d)(4)]*

G. Mitigation

1. The source has no federal offset requirements. *[AQR 59.1.1]*

IV. OTHER REQUIREMENTS

1. It is the Permittee's responsibility to satisfy all federal requirements to which the source is subject.
2. The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a CFC or HCFC compound as a working fluid, unless such fluid has been approved for sale in such use by the Administrator. The Permittee shall keep record of all paperwork relevant to the applicable requirements of 40 CFR 82 on site. *[40 CFR 82]*

V. PERMIT SHIELD

1. The source did not request a permit shield.

ATTACHMENT 1

APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. NRS, Chapter 445B.
2. Applicable AQR Sections:

Citation	Title
AQR Section 0	Definitions
AQR Section 4	Control Officer
AQR Section 5	Interference with Control Officer
AQR Section 8	Persons Liable for Penalties – Punishment: Defense
AQR Section 9	Civil Penalties
AQR Section 10	Compliance Schedule
AQR Section 12.2	Permit Requirements for Major Sources in Attainment Areas
AQR Section 12.3	Permit Requirements for Major Sources in Non-Attainment Areas
AQR Section 12.4	Authority to Construct Application and Permit Requirements for Part 70 Sources
AQR Section 12.5	Part 70 Operating Permit Requirements
AQR Section 12.9	Annual Emissions Inventory Requirement
AQR Section 12.12	Transfer of Permit
AQR Section 12.13	Posting of Permit
AQR Section 13	National Emission Standards for Hazardous Pollutants
AQR Section 14	New Source Performance Standards
AQR Section 18	Permit and Technical Service Fees
AQR Section 25	Affirmative defense for Excess Emissions Due to Malfunctions, Startup and Shutdown
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 40	Prohibition of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

3. CAAA, Authority: 42 U.S.C. § 7401, et seq.
4. Applicable 40 CFR Subsections:

Citation	Title
40 CFR 52.21	Prevention of Significant Deterioration (PSD)
40 CFR 52.1470	SIP Rules
40 CFR 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR 60 Appendix A	Method 9 or equivalent, (Opacity)
40 CFR 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels
40 CFR 60 Subpart XX	Standards of Performance for Bulk Terminals
40 CFR 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminal, Bulk Plants and Pipelines Facilities

Citation	Title
40 CFR 63 Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories-General Provisions
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 70	Federally Mandated Operating Permits
40 CFR Part 80 Subpart B Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Acts Sections 112(G) and 112(J).	§63.43 Maximum achievable control technology (MACT) determinations for constructed and reconstructed major sources.
40 CFR 82	Protection of Stratospheric Ozone