

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE

PERMITTEE

Hartford-Wood River Terminal  
Attn: Matthew W. Schrimpf  
1 Piasa Lane  
Hartford, Illinois 62048

Application No.: 72101132

I.D. No.: 119050AAE

Applicant's Designation:

Date Received: April 10, 2000

Subject: Bulk Gasoline Terminal

Date Issued: November 13, 2000

Expiration Date: November 13, 2005

Location: 900 North Delmar, Hartford

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a 9,875 barrel trans-mix storage tank, two 18,800 barrel gasoline internal floating roof storage tanks(20-5, 20-6), a 19,600 barrel ethanol cone roof storage tank(20-7), a 18,535 barrel kerosene internal floating roof storage tank(20-4), a 71,700 barrel jet fuel external floating roof storage tank(80-6), a 71,700 barrel jet fuel internal floating roof storage tank(80-7), three 71,700 barrel gasoline external floating roof storage tanks(80-5, 80-9, 80-10), an 86,000 barrel #2 fuel oil external floating roof storage tank(80-8), a 8000 gallon gasoline additive aboveground storage tank, a 10,000 gallon IVD gasoline additive above ground storage tank, a 10,000 gallon vertical fixed roof gasoline additive storage tank, an 8000 gallon vertical fixed roof diesel fuel additive storage tank, a 50,000-bbl high sulfur #2 diesel internal floating roof tank 50-1, and three gasoline loading racks with vapor recovery system (carbon adsorber or John Zink vapor combustion unit) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tpy of VOM, 25 tpy combined HAPs, and 10 tpy single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The four 71,700 barrel storage tanks (80-5, 6, 9, 10) are subject to New

Source Performance Standards (NSPS), 40 CFR 60, Subparts A and Ka. The 4 additive tanks are subject to Subparts Kb. The one 71,700-bbl jet fuel and three 18,000-bbl tanks (80-7, 20-4, 5, 6) are subject to Subparts A and K. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.

- b. Tanks (80-5, 9, 10) shall comply with the equipment standards contained in the NSPS, 40 CFR 60.112a(a)(1) and the 4 additive tanks shall comply with 40 CFR 60.116b(b).
- 3a. Emissions and operation of equipment shall not exceed the following:

<u>Tanks</u>	<u>Capacity (Million Gal)</u>	<u>Tank Type</u>	<u>Material</u>	<u>Throughput (Million Gal/Yr)</u>	<u>Vapor Pressure (psia)</u>	<u>VOM Emissions (TPY)</u>
4 Additive						
Tanks	8-10 kgal/Each	VFR	Additives	0.077	1.7	0.5
80-5	3	EFR	Gasoline	37.0	5.0	10.2
80-6	3	EFR	Jet Fuel	10.0	1.21	2.57
80-7	3	IFR	Jet Fuel	100.0	1.21	1.04
80-8	3.5	EFR	#2 Fuel Oil	100.0	0.1	0.12
80-9	3	EFR	Premium Gas	11.0	6.7	14.0
80-10	3	EFR	Gasoline	72.0	5.0	10.22
20-4	0.75	EFR	Kerosene	3.0	0.1	0.03
20-5	0.75	IFR	Gasoline	2.75	5.0	1.78
20-6	0.75	IFR	Gasoline	1.0	5.0	1.91
20-7	0.75	VFR	Ethanol	5.4	0.8	2.82
10-15	0.4	VFR	Gasoline	0.45	5.5	7.32
50-1	1.575	IFR	High Sulfur #2 Diesel	28.35	3.33	2.06
4 Loading						
Racks			High Sulfur #2 Diesel		3.33	
			and Jet Fuel	42.35	1.21	15.9
			#2 Fuel Oil	100.0	0.1	0.7
			All Other Fuels	167.5		<u>24.5</u>
					Total:	95.7

These limits are based on maximum vapor pressure, throughputs and tanks 4.0. Loading rack limit is based on a 50% control efficiency for high sulfur #2 diesel and jet fuels, vapor combustion unit efficiencies of 0.292 lb/kgal of gasoline, and standard AP-42 emission factors. Compliance shall be determined from a running total of the previous 12 months data.

- b. The Permittee shall notify the Illinois EPA of any change in the type of materials stored that are different from those identified in the application.
- 4. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 5. This permit is issued based on no construction, reconstruction, or modification of the loading racks since December 17, 1980. For this reason, the loading racks are exempt from NSPS, Subpart XX for Gasoline Terminals pursuant to 40 CFR 60.500b.

6. This permit is also issued based on potential emissions of hazardous air pollutants (HAPs) not exceeding 10 tpy for a single HAP and 25 tpy for all combined HAPs. For this reason, the petroleum terminal is exempt from National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart R for Gasoline Terminals.

- 7a. This permit is issued based upon the addition of a John Zink vapor combustion unit to control emissions of vapors from the loading racks.
- b. If a malfunction or breakdown of the vapor combustion unit occurs such that there is no control of emissions from the loading of gasoline, Permittee will notify the Illinois EPA regional office in Collinsville at 618/345-0700 on the same or next working day. The time of occurrence and type of malfunction and breakdown shall be given.
- c. Operation during malfunction and breakdown of the vapor combustion unit is allowed for a period of 72 hours.
- d. If the malfunction and breakdown cannot be corrected within 72 hours the Permittee shall notify the regional office and the regional office may allow operation during malfunction and breakdown for a longer period of time on a case-by-case basis.
- e. The Permittee shall inspect for leakage all of the components of the vapor control systems which carry volatile organic material vapors according to the following intervals:
  - i. Pump seals shall be inspected visually every week.
  - ii. All valves and the coupler that connects to the delivery vessel shall be inspected by a portable detection unit between March 1 and April 30 of each year. All leaks shall be promptly repaired and a reinspection made within 3 months of those valves which were leaking.
- f. Loading of gasoline shall not exceed 3,500 gpm.
- g. The Permittee shall submit a quarterly report summarizing the quantity of emissions, the type and duration of each malfunction, and the steps taken to reduce the occurrence of each malfunction or breakdown.
- 8a. A volatile organic liquid (VOL) that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11.1 psi) shall not be stored in Storage Tanks 80-5, 9, and 10 unless the tank is equipped with external floating roof meeting the specifications of 40 CFR 60.112a(a)(1) for Tanks 80-5, 9, and 10.
- b. The Permittee shall follow monitoring and maintenance requirements of 40 CFR 60.113a(a)(1) and 60.115a for Tanks 80-5, 9, and 10.
- 9a. Emissions of organic material into the atmosphere shall not exceed 3.6 kg/hr (8 lbs/hr) during the loading of any organic material from the aggregate loading pipes of any loading area having throughput of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck, or trailer unless such loading area is equipped with submerged loading pipes or an equivalent device (35 Ill. Adm. Code 219.122(a)).

- b. All tanks with a vapor pressure greater than 2.5 psia shall be equipped with a permanent submerged loading pipe, vapor recovery system, or equivalent device in accordance with 35 Ill. Adm. Code 219.122(b).

10. The Permittee shall comply with the control requirements in 35 Ill. Adm. Code 219.120 for Tanks 20-7 and 80-8 and 219.121 for the six (6) Gasoline Tanks 10-15, 20-5, 6, 80-5, 9, and 10.
11. The four (4) loading racks shall be operated in accordance with 35 Ill. Adm. Code 219.582.
12. Testing, monitoring, and recordkeeping of all volatile organic liquids shall be done in compliance with 35 Ill. Adm. Code 219.127, 219.128, and 219.129, respectively.
13. At all times the Permittee shall, to the extent practicable, maintain and operate the equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
14. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
15. The Permittee shall maintain monthly records of the following items:
  - a. Material stored in each tank (vapor pressure).
  - b. Throughput (gallons/month and gallons/year).
  - c. Material throughput for all loading racks (vapor pressure, gallons/month and gallons/year).
16. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
17. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
18. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

19. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Material stored in each tank (vapor pressure) and throughput (gallons/month and gallons/year) and material throughput (vapor pressure, gallons/month and gallons/year) for all loading racks.

Please note that high sulfur diesel fuel Tank 50-1 has been added to this permit.

Also, please note that all materials handled by this facility must be included in the throughput limit. This includes materials transferred between pipeline, barge, truck, and/or rail car.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 3  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the bulk petroleum terminal operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 238 million gallons of fuel (e.g., gasoline, jet fuel, fuel oil, etc) a year. The resulting maximum emissions are well below the levels, e.g., 100 tpy of VOM, 25 tpy combined HAPs, and 10 tpy single HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions from the bulk petroleum terminal shall not exceed the following limits:

<u>Equipment</u>	<u>Fuel</u>	VOM Emissions (TPY)
All Tanks	All Fuels	54.6
All Loading Racks	High Sulfur #2 Diesel and Jet Fuel	15.9
	#2 Fuel Oil	0.7
	All Other Fuels	<u>24.5</u>
	Total:	95.7

2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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