

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
NSPS SOURCE

PERMITTEE

Buckeye Terminals, LLC
Attn: Jason Mengel
5002 Buckeye Road
Post Office Box 368
Emmaus, Pennsylvania 18049

Application No.: 72101131

I.D. No.: 201808AAD

Applicant's Designation:

Date Received: January 26, 2006

Subject: Bulk Terminal

Date Issued:

Expiration Date:

Location: 1511 South Meridian Road, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of seven internal floating roof storage tanks (Tanks 25-1, 35-1, 10-1, 35-1, 20-4, 20-3, and 20-1), eight fixed roof storage tanks (Tanks 4-1, 4-2, 4-3, 10-2, 10-3, 12, 18, and 20-2), and one truck loading rack equipped with a 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., volatile organic material (VOM) to less than 100 tons/year, combined hazardous air pollutants (HAPs) to less than 25 tons/year, and single hazardous air pollutant (HAP) to less than 10 tons/year). 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 initial 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.
2. This permit is issued based on the source not being a major stationary source as defined at 40 CFR 51.166(b) or 40 CFR 52.21(b), a major source, source or support facility as defined at Section 39.5 of the Illinois Environmental Protection Act, or receiving support from another facility (West Shore Pipe Line Company, I.D. No. 201808ABB, located at 7245 Cunningham Road, Rockford) as described at 45 FR 52695, for New Source Review (NSR) or Title V permitting purposes based on the information in the administrative record for this permit.

- 3a. Storage tank 10-1 is subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subparts A and Kb. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.112b(a)(1), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ (39,889.67 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) or with a design capacity greater than or equal to 75 m³ (19,815.75 gallons) but less than 151 m³ (39,889.67 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - A. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 4a. The truck loading rack with vapor collection/combustion system is subject to a New Source Performance Standard (NSPS) for Bulk Gasoline Terminals, 40 CFR 60, Subparts A and XX. The Illinois EPA is administering NSPS on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.502, on and after the date on which 40 CFR 60.8(a) requires a performance test to be completed, the owner or operator of each bulk gasoline terminal containing an affected facility shall comply with the requirements of 40 CFR 60.502.
- b. Pursuant to 40 CFR 60.502(a), each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.
 - c. Pursuant to 40 CFR 60.502(b), the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in 40 CFR 60.502(c).

- d. Pursuant to 40 CFR 60.502(c), for each affected facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 80 milligrams of total organic compounds per liter of gasoline loaded.
- e. Pursuant to 40 CFR 60.502(d), each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- 5. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 6a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- 7. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 8a. Pursuant to 35 Ill. Adm. Code 215.121(b)(1), No person shall cause or allow the storage of any volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 K (70°F) or any gaseous organic material in any stationary tank, reservoir or other container of more than 151 cubic meters (40,000 gallons) capacity unless such tank, reservoir or other container is designed and equipped with a floating roof which rests on the surface of the volatile organic liquid and is equipped with a closure seal or seals between the roof edge and the tank wall. Such floating roof shall not be permitted if the volatile organic liquid has a vapor pressure of 86.19 kPa (12.5 psia)

or greater at 294.3°K (70°F). No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling devices attached to such tanks, except during sampling or maintenance operations.

- b. Pursuant to 35 Ill. Adm. Code 215.122(a), no person shall cause or allow the discharge of more than 3.6 kgs/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading facility having throughput of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading facility is equipped with submerged loading pipes, submerged fill, or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201.
- c. Pursuant to 35 Ill. Adm. Code 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).
- d. Pursuant to 35 Ill. Adm. Code 215.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- e. Pursuant to 35 Ill. Adm. Code 215.123(a)(5), the requirements of 35 Ill. Adm. Code 215.123(b) shall not apply to any stationary storage tank subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR 60. The provisions of Section 111 of the Clean Air Act relating to standards of performance for new stationary sources are applicable in this State and are enforceable under [The Environmental Protection Act]. (Ill. Rev. Stat., Ch. 111 1/2, par. 1009.1(b)).
- f. Pursuant to 35 Ill. Adm. Code 215.123(b), no owner or operator of a stationary storage tanks shall cause or allow the storage of any volatile petroleum liquid in the tank unless:
 - i. The tank is equipped with one of the vapor loss control devices specified in 35 Ill. Adm. Code 215.121(b).
 - ii. There are no visible holes, tears or other defects in the seal or any seal fabric or material of any floating roof.
 - iii. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that:

- A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.
- g. Pursuant to 35 Ill. Adm. Code 215.582(a), no person shall cause or allow the transfer of gasoline into any delivery vessel from any bulk gasoline terminal unless:
- i. The bulk gasoline terminal is equipped with a vapor control system that limits emission of volatile organic material to 80 mg/liter (0.00067 lbs/gallon) of gasoline loaded;
 - ii. The vapor control system is operating and all vapors displaced in the loading of gasoline to the delivery vessel are vented only to the vapor control system;
 - iii. There is no liquid drainage from the loading device when it is not in use;
 - iv. All loading and vapor return lines are equipped with fittings which are vapor tight; and
 - v. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 Ill. Adm. Code 215.584(b) or (d); or, if the terminal is driver-loaded, the terminal owner or operator shall be deemed to be in compliance with 35 Ill. Adm. Code 215.582 when terminal access authorization is limited to those owners and/or operators of delivery vessels who have provided a current certification as required by 35 Ill. Adm. Code 215.584(c)(3).
- 9a. Pursuant to 40 CFR 60.502(e), loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
- i. The owner or operator shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.
 - ii. The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

- iii. A. The owner or operator shall cross-check each tank identification number obtained in 40 CFR 60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:
 - I. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - II. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
- B. If either the quarterly or semiannual cross-check provided in 40 CFR 60.502(e)(3)(i)(A) through (B) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.
- iv. The terminal owner or operator shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in 40 CFR 60.502(e)(3).
- v. The terminal owner or operator shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.
- b. Pursuant to 40 CFR 60.502(f), the owner or operator shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- c. Pursuant to 40 CFR 60.502(g), the owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.
- d. Pursuant to 40 CFR 60.502(h), the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

- e. Pursuant to 40 CFR 60.502(i), no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).
- 10a. Gasoline blend, gasoline, and other material with a true vapor pressure of 2.5 psia or greater shall only be loaded out through the loading racks using submerged loading and only with the vapor control system properly operating.
 - b. Gasoline and gasoline blend means; any commercial quality gasoline and blend stocks for use as fuel in motor vehicle without further processing.
 - c. A petroleum product shall be considered to be a distillate material if the true vapor pressure is less than 0.01 psia at 70°F.
- 11a. Emissions and operation of bulk terminal operations shall not exceed the following limits:

i. Emissions and operation of storage tanks:

<u>Process</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Gasoline Storage**	57,000,000	684,000,000	2,811	13.83
Distillate Storage**	10,000,000	120,000,000	135	0.60
Ethanol Storage**	13,000,000	156,000,000	430	2.80
Additive Storage**	15,000	180,000	20	0.10
Transmix Storage**	18,000	216,000	20	0.10
			Total	17.43

These limits are based on standard emission factors (Section 7.1, AP-42, Fifth Edition, Volume I, November 2006) for breathing and working losses and Tanks 4.0 software.

ii. Emissions and operating of the loading operations:

<u>Process</u>	<u>Throughput</u>		<u>Emission</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lbs/Gal)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Gasoline Blend# and/ or Gasoline Loadout Fugitive Losses From the Loading Rack from Gasoline/ Gasoline Blend#	43,000,000	430,000,000	0.000292***	12,556	62.78
Ethanol Loadout	1,000,000	10,000,000	0.000265	265	1.33
Distillate Loadout	12,000,000	120,000,000	0.00000858	103	0.51
				Total	79.07

Gasoline blend consists of gasoline and up to 10% ethanol.

*** Based on emission limits of 35 mg/L

These limits are based on standard emission factors (Section 5.2, AP 42, Fifth Edition, Volume I, December 1995) for uncaptured emissions of VOM, an 98.7% overall control efficiency for fugitive losses for the loadout of gasoline/gasoline blend, 0% for Ethanol, and 0% for distillate for the following equation:

$$E = \frac{(12.46 * S * P * M) * (1 - EFF)}{(T)}$$

E is the loading loss (lb/1,000 gal)
 S is the saturation factor
 P is true vapor pressure of the liquid loaded (psia)
 M is vapor molecular weight (lb/lb-mole)
 T is the temperature of the bulk liquid loaded (°R)
 Eff is the overall control efficiency.

- b. Emissions of VOM from fugitive losses (pumps, valves, seals, etc.), and maintenance activities shall not exceed 2.0 tons/year.
- c. Operation and emissions of the gasoline/ethanol storage tank shall not exceed the following limits:

<u>Unit</u>	<u>Material</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
		<u>(10³ Gal/Mo)</u>	<u>(10³ Gal/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Tank 10-1	Gasoline	6,090	60,900	0.24	2.4
Tank 20-2	Distillate	11,928	119,280	0.05	0.5

These limits are based on standard emission factors (Section 7.1, AP-42, Fifth Edition, Volume I, November 2006) or use of the TANKS 4.0 software and the maximum throughput for gasoline and distillate fuel oil. The above limitations were established in Permit 06080008, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- 12. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

13. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 14a. Pursuant to 35 Ill. Adm. Code 215.586(a), any tests of organic material emissions from bulk gasoline terminals, including tests conducted to determine control equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the Test Methods and Procedures for the Standards of Performance for Bulk Gasoline Terminals, 40 CFR 60.503. Any alternate test method must be approved by the Illinois EPA, which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.
- b. Pursuant to 35 Ill. Adm. Code 215.586(b), upon a reasonable request by the Illinois EPA, the owner or operator of a volatile organic material emission source subject to 35 Ill. Adm. Code 215 Subpart Y shall conduct emissions testing, at such person's own expense, to demonstrate compliance.
- 15a. Pursuant to 40 CFR 60.113b(a), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:
 - i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. 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 owner or operator shall repair the items before filling the storage vessel.
 - ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA or USEPA in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that

the control equipment will be repaired or the vessel will be emptied as soon as possible.

- iii. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
 - A. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every 5 years; or
 - B. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).
- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) and (a)(3(ii) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a)(3)(i).
- b. Pursuant to 40 CFR 60.502(j), each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or 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.
- c. Pursuant to 40 CFR 60.503(d)(1), the owner or operator shall determine compliance with the standard in 40 CFR 60.502(h) with a pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.
- 16a. Pursuant to 35 Ill. Adm. Code 215.123(b), no owner or operator of a stationary storage tanks shall cause or allow the storage of any volatile petroleum liquid in the tank unless:

- i. Routine inspections of floating roof seals are conducted through roof hatches once every six months.
 - ii. A complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semiannual inspection or incidence of roof damage or defect.
- b. Pursuant to 35 Ill. Adm. Code 215.582(c), the operator of a bulk gasoline terminal shall:
- i. Operate the terminal vapor collection system and gasoline loading equipment in a manner that prevents:
 - A. Gauge pressure from exceeding 18 inches of water and vacuum from exceeding 6 inches of water as measured as close as possible to the vapor hose connection; and
 - B. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B; and
 - C. Avoidable leaks of liquid during loading or unloading operations.
 - ii. Provide a pressure tap or equivalent on the terminal vapor collection system in order to allow the determination of compliance with 35 Ill. Adm. Code 215.582(c)(1)(A).
- 17a. Pursuant to 40 CFR 60.115, the owner or operator of each storage vessel as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as required by 40 CFR 60.115(a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. The owner or operator shall keep copies of all reports and records required by 40 CFR 60.115, except for the record required by 40 CFR 60.115 (c)(1), for at least 2 years. The record required by 40 CFR 60.115(c)(1) will be kept for the life of the control equipment.
- b. Pursuant to 40 CFR 60.115b(a)(2), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- c. Pursuant to 40 CFR 60.116b(a), the owner or operator shall keep copies of all records required by 40 CFR 60.116b, except for the record required by 40 CFR 60.116b(b), for at least 2 years. The record

required by 40 CFR 60.116b(b) of this section will be kept for the life of the source.

- d. Pursuant to 40 CFR 60.116b(b), the owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- 18a. Pursuant to 40 CFR 60.505(a), the tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.
- b. Pursuant to 40 CFR 60.505(b), the documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:
 - i. Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.
 - ii. Tank owner and address.
 - iii. Tank identification number.
 - iv. Testing location.
 - v. Date of test.
 - vi. Tester name and signature.
 - vii. Witnessing inspector, if any: Name, signature, and affiliation.
 - viii. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
 - c. Pursuant to 40 CFR 60.505(c), a record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:
 - i. Date of inspection.
 - ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
 - iii. Leak determination method.
 - iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - v. Inspector name and signature.

- d. Pursuant to 40 CFR 60.505(d), the terminal owner or operator shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years.
 - e. Pursuant to 40 CFR 60.505(e), as an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in Pursuant to 40 CFR 60.505(a), (c), and (d), an owner or operator may comply with the requirements in either Pursuant to 40 CFR 60.505(e)(1) or (2).
 - i. An electronic copy of each record is instantly available at the terminal.
 - A. The copy of each record in Pursuant to 40 CFR 60.505(e)(1) is an exact duplicate image of the original paper record with certifying signatures.
 - B. The permitting authority is notified in writing that each terminal using this alternative is in compliance with Pursuant to 40 CFR 60.505(e)(1).
 - ii. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.
 - A. The copy of each record in Pursuant to 40 CFR 60.505(e)(2) is an exact duplicate image of the original paper record with certifying signatures.
 - B. The permitting authority is notified in writing that each terminal using this alternative is in compliance with Pursuant to 40 CFR 60.505(e)(2).
 - f. Pursuant to 40 CFR 60.505(f), the owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.
19. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5

years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

20. Pursuant to 35 Ill. Adm. Code 215.123(b)(6), no owner or operator of a stationary storage tanks shall cause or allow the storage of any volatile petroleum liquid in the tank unless a record of the results of each inspection conducted under 35 Ill. Adm. Code 215.123(b)(4) or 35 Ill. Adm. Code 215.123(b)(5) is maintained.
- 21a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. The throughput of each product through the loading racks (gallons/month and gallons/year);
 - ii. The throughput of each product stored and in what storage tank (gallons/month and gallons/year);
 - iii. Emissions of VOM and HAP for each product from the truck loading racks as determined through Standard AP-42 emissions factors or other methods approved by the USEPA (lbs/month and tons/year);
 - iv. Total emissions of VOM and HAP for each product from the Storage Tanks as determined through Standard AP-42 emission factors or the most current version of the TANKs software (lbs/month and tons/year); and
 - v. Monthly and annual emissions of VOM and HAP from the source with supporting calculations (lbs/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.

22. If there is an exceedance or deviation from 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.
- 23a. Pursuant to 40 CFR 60.113b(a)(5), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall notify the Illinois EPA or USEPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) to afford the Illinois EPA or USEPA the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Illinois EPA or USEPA 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 Illinois EPA or USEPA at least 7 days prior to the refilling.
- b. Pursuant to 40 CFR 60.115b(a), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.
 - i. Furnish the Illinois EPA or USEPA with 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). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).
 - ii. If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - iii. After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed

in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made.

- 24a. Pursuant to 35 Ill. Adm. Code 215.582(c)(3), the operator of a bulk gasoline terminal shall within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA repair and retest a vapor collection system which exceeds the limits of 35 Ill. Adm. Code 215.582(c)(1)(A) or (B).
- b. Pursuant to 35 Ill. Adm. Code 215.586(c), a person planning to conduct an organic material emissions test to demonstrate compliance with 35 Ill. Adm. Code 215 Subpart Y shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test.
25. Two (2) copies of required reports and notifications 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
5415 North University
Peoria, Illinois 61614

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

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:MJD:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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 this bulk terminal. The limits as shown below limit storage and loadout of the various products handled by the facility. The resulting maximum emissions are below the levels (e.g., volatile organic material (VOM) to less than 100 tons/year, combined hazardous air pollutants (HAPs) to less than 25 tons/year, and single hazardous air pollutants (HAP) to less than 10 tons/year) 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 product material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Gasoline Storage	13.83		
Distillate Storage	0.60		
Ethanol Storage	2.80		
Additive Storage	0.10		
Transmix Storage	0.10		
Gasoline Blend and/or Gasoline Loadout	62.78		
Fugitive Losses from the Loading Rack from Gasoline/ Gasoline Blend	14.45		
Ethanol Loadout	1.33		
Distillate Loadout	0.51		
fugitive losses (pumps, valves, seals, etc)	<u>2.00</u>		
Totals	<u>98.50</u>	<u>9.0</u>	<u>22.5</u>

MJD:psj