

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Phillips Pipe Line Company
Attn: Clint Gill
411 Keeler, 354 Adams Building
Bartlesville, Oklahoma 74004

<u>Application No.:</u> 73010623	<u>I.D. No.:</u> 115805AAB
<u>Applicant's Designation:</u> DEC DIST T	<u>Date Received:</u> November 30, 2000
<u>Subject:</u> Decatur Products Distribution Terminal	
<u>Date Issued:</u> February 22, 2001	<u>Expiration Date:</u> November 28, 2005
<u>Location:</u> 266 East Shafer Street, Forsyth	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of eight external floating roof storage tanks (five equipped with primary and secondary seals [tanks 052, 053, 153, 154, and 801], and three equipped with mechanical shoe primary seals [tanks 051, 151, and 152]), six fixed roof storage tanks (tanks 201, A1, A2, A3, A4 and A5), one internal floating roof storage tank (tank 301), an oil-water separator, a propane loading rack (with methanol), associated pumps, and one truck loading racks equipped with a vapor combustor 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 Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAP) from the terminal to less than major source thresholds (i.e., 100 tons/yr for VOM, 10 tons/yr for a single HAP, and 25 tons/yr for combined HAPs), as further described in Attachment A. As a result, the source is excluded from requirements 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 comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Operation of the terminal shall not exceed the following limits, verified each month:
 - i. Loadout of Gasoline: 132,000,000 gal/year
 - ii. Loadout of Distillate: 170,000,000 gal/year

- iii. Loadout of Propane: 108,000,000 gal/year (and 65,000 gal/year Methanol)
- iv. Loadout of Ethanol: 12,600,000 gal/year
- v. Storage Tank Throughputs:
 - 542,700,000 gal/year for gasoline/transmix
 - 340,000,000 gal/year for distillates
 - 13,060,100 gal/year for ethanol/additives
- b. Emissions of VOM shall not exceed the following limits, verified each month:
 - i. Storage and Loading of Gasoline/Transmix: 85.71 tons/year
 - ii. Storage and Loading of Distillate: 2.36 tons/year
 - iii. Storage and Loading of Ethanol/Additives: 0.14 tons/year
 - iv. Propane Loading (with methanol) 6.26 tons/year
 - v. Fugitive Losses (Valves, Pump Seals, etc.): 2.11 ton/year
 - vi. Support Activities (Maintenance, Oil/Water Separator, etc.): 3.00 tons/year
- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.
- d. Compliance with annual limits shall be determined each month from the sum of the data for the current month plus the preceding 11 months. These limits are based on standard emission factors (Tanks 4.07 or its revision).
- 3a. Storage tanks 052, 053, 153, 154, 301, and 801 shall be operated in accordance with the requirements of 35 Ill. Adm. Code 215.123(b), when storing a volatile petroleum liquid, including:
 - i. Being equipped with a floating roof.
 - 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 the floating roof decks, except stub drains, shall be equipped with covers, lids, or other 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.
 - iv. Routine inspections of floating roof seals are conducted through the roof hatches once every six months.
 - v. A complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied and degassed or whenever repairs are made as a result of any semi-annual inspection of roof damage or defect.
- b. Storage tanks 052, 153, 154, and 801 shall be operated in accordance with the requirements of 35 Ill. Adm. Code 215.124, when storing a volatile petroleum liquid, including:
- i. The tank shall be fitted with a continuous secondary seal extending from the floating roof to the tank wall (rim mounted secondary seal) or any other device which controls volatile organic material emissions with an effectiveness equal to or greater than a rim mounted secondary seal.
 - ii. Each seal closure device shall meet the following requirements:
 - A. The seal is intact and uniformly in place around the circumference of the floating roof and tank wall; and
 - B. The accumulated area of gaps exceeding 0.32 centimeters (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inches per foot of tank diameter).
 - iii. Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening.
 - iv. Openings are equipped with projections into the tank which remain below the liquid surface at all times.
 - v. Inspections are conducted prior to May 1 of each year to insure compliance with 35 Ill. Adm. Code 215.124(a).

- vi. The secondary seal gap is measured prior to May 1 of each year.
 - vii. Records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid stored, the results of the inspections and the results of the secondary seal gap measurements are maintained and available to the Illinois EPA for inspection and copying, for a minimum of two years after the date on which the record was made.
- c. Storage tanks 051, 151, and 152 shall only be used to stored petroleum liquid with a true vapor pressure less than 4.0 psia at 70°F pursuant to 35 Ill. Adm. Code 215.124(b)(3).
 - d. Storage tanks 201 and 053 shall not be used to store volatile petroleum liquid pursuant to 35 Ill. Adm. Code 215.123(a)(6).
4. Pursuant to 35 Ill. Adm. Code 215.582(b), the Permittee shall provide a pressure tap or equivalent on the vapor collection system. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection.
- 5a. Gasoline and other material with a vapor pressure of 2.5 psia or greater shall only be loaded out through the truck loading racks, using submerged loading, and only with the vapor control system properly operating.
- b. For the purpose of this permit:
 - i. Gasoline means commercial quality gasoline and blend stocks for commercial quality gasoline.
 - ii. 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.
 - iii. An interface material shall be considered to be gasoline if it is shipped for use as a motor vehicle fuel without further processing.
- 6a. The Permittee shall inspect the components of the vapor collection system which carry VOM vapors for leaks 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 on those valves which were leaking.

- b. Each detection of a leak shall be recorded and the component repaired as soon as practicable, but not later than 15 days after the leak is detected.
- 7a. The Permittee shall maintain daily records of the time and duration of any control system malfunction or breakdown.
- b. The Permittee shall keep monthly records of the following items:
 - i. The throughput of gasoline and other products through the truck loading racks (gal/month);
 - ii. Records of the throughput of each type of material stored (gal/month);
 - iii. Calculations of the VOM and HAP emissions of each material, determined using the appropriate USEPA procedures, e.g., USEPA's "Compilation of Emission Factors", AP-42 and assuming emissions result from the tank generating the highest emission rate. These calculations will be required no later than 30 days after requested by the Illinois EPA and the records of throughput and other relevant data have been recorded;
 - iv. Records on the annual VOM and HAP emissions of each material, determined as the sum of the emission data for the month and the previous eleven months;
 - v. Records of loadout for each material other than gasoline;
 - vi. Calculations of VOM and HAP emissions for loadout of each material, determined using appropriate USEPA calculation procedures, USEPA's "Compilation of Emission Factors", AP-42; and
 - vii. Records of total annual emissions of VOM and HAP.
 - c. The Permittee shall also maintain records of the following items:
 - i. Truck operator's pre-loading certification of vapor tightness documentation for each gasoline tank truck loaded at the facility;
 - ii. The tank identification number of each truck loaded at the facility; and
 - iii. Results of all performance tests conducted on the vapor combustor unit.
 - d. 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.

8. As a consequence of this federally enforceable state operating permit limiting HAP emissions to below 25 tons/year, the Permittee will not be required to demonstrate applicability of 40 CFR Parts 9 and 63 (NESHAP for Source Categories: Gasoline Distribution) for this facility.
- 9a. Within 90 days of a written request from the Illinois EPA or USEPA, the VOM emissions from the gasoline loading rack shall be measured during conditions which are representative of the maximum performance. The Illinois EPA may provide additional time for the performance of this testing upon request and demonstration from the Permittee which shows that it is not feasible to perform representative testing within 90 days.
- b. The performance test shall be performed in accordance with the methods specified in 40 CFR 60.503 for Bulk Gasoline Terminals.
- c. Testing shall be performed by a qualified independent testing service.
- d. At least 30 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. A copy shall also be submitted to the USEPA. This plan shall describe the specific procedures for testing, including:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests; and
 - ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- e. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may, at its discretion, accept notification with shorter notice provided that the Illinois EPA will not accept such notifications it interferes with the Illinois EPA's ability to observe the testing.
- f. The Final Report(s) for the tests specified in this Condition shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:
 - i. General information describing the test, including the name and identification of the emission source which was tested, date of

test, name of personnel performing the test, and Illinois EPA observers, if any;

- ii. A summary of results;
 - iii. Description of test procedures, including description of sampling points, test equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. Process information, i.e., process rate, material loaded, etc.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- g. Submittals of information shall be made as follows:
- i. Notices of Test - one copy to Source Emission Test Specialist and one copy to the Regional Office.
 - ii. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.

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

Illinois Environmental Protection Agency
Attn: Source Emission Test Specialist
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60116

- 10a. The Permittee shall notify the Illinois EPA on any change in the type of material stored from those identified in the application.
 - b. The Permittee shall notify the Illinois EPA of any record showing a violation of any applicable limit or failure to comply with any requirement of this permit by sending a copy of such record to the Illinois EPA within 30 days after the end of the calendar quarter in which the violation occurs.
11. 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.

12. 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

13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: throughput of all materials (petroleum products, distillates, additives, etc.), and the VOM and HAP emissions from the prior calendar year. If there have been no exceedances during the prior calendar year, the Annual Emissions Report shall include a statement to that effect.

Please note that this permit is revised to include methanol storage and loading for the propane loading rack.

If you have any questions concerning this permit, please contact John Blazis at 217/782-2113.

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

DES:JPB:jar

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

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the distribution 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. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM, 10 tons per year of individual HAP and 25 tons per year of combined HAPs, 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.

1a.	Emissions of VOM from the terminal attributable to gasoline:	85.71 tons/year
b.	Emissions of VOM attributable to distillate petroleum products (true vapor pressure less than 0.01 psia):	2.36 tons/year
c.	Emissions of VOM attributable to ethanol/additives:	0.14 tons/year
d.	Emissions of VOM attributable to propane loading:	6.26 tons/year
e.	Emissions of VOM from fugitive losses (valves, pump seals, etc.):	2.11 tons/year
f.	Emissions of VOM from support activities (facility maintenance, boiler, etc.):	3.00 tons/year
	Total:	99.58 tons/year

2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.

3. Emissions of the products of combustion attributable to the use of a vapor combustor unit:

<u>Pollutant</u>	<u>Annual Emissions (Tons/Year)</u>
NO _x	52.6
CO	13.14