# STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

# TO OPERATE AIR EMISSIONS EQUIPMENT

# **THIS CERTIFIES THAT**

Colonial Pipeline Company, Collins Complex 35 Pump Station Road Collins, Mississippi Covington County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: MAY 1 9 2017

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: April 30, 2022

Permit No.: 0640-00013

1817 PER20140001

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## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
  - (a) This permit shall be reopened and revised under any of the following circumstances:
    - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
    - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
    - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
    - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply

to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such

judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision 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 this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
  - (a) enter upon the permittee's premises where a Title V source is located or emissionsrelated activity is conducted, or where records must be kept under the conditions of this permit;

- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
    - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
  - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

(f) any change in ownership of the stationary source."

(Ref.: 11 Miss. Admin. Code Pt. 2. R. 2.1.C(15).)

- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
  - (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:
  - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused

by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
    - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
- (ii) The source was at the time being properly operated;
- (iii) During the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
- (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
- (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities. (Ref.: 11 Miss. Admin. Code Pt. 2. R. 1.8.)

# SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
IA	Insignificant Activities
AA-000	Leaks from Equipment in Gasoline Service
AA-001	6,076,686 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2065)
AA-002	4,983,132 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2066)
AA-003	4,512,018 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2067)
AA-004	7,046,004 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2068)
AA-005	8,353,506 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2074)
AA-006	4,971,624 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2076)
AA-007	64,176 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Pressure Relief Tank with Internal Floating Roof (Facility Reference: Tank No. 2072)
AA-008	101,388 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Pressure Relief Tank with Internal Floating Roof (Facility Reference: Tank No. 2073)
AA-009	7,190,946 Gallon Refined Petroleum Fuels (Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 2069)
AA-010	9,256,044 Gallon Refined Petroleum Fuels (Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 2070)
AA-011	7,833,798 Gallon Refined Petroleum Fuels (Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 2071)
AA-012	7,218,750 Gallon Refined Petroleum Fuels (Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 2075)

Emission Point	Description
AA-013	7,792,680 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2083)
AA-014	7,807,380 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof (Facility Reference: Tank No. 2084)
AA-015	126,000 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Pressure Relief Tank with Internal Floating Roof (Facility Reference: Tank No. 5043)
AA-016	18,204 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 5040)
AA-017	26,250 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 5048)
AA-018	18,204 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Storage Tank with Fixed Roof (Facility Reference: Tank No. 5060)
AA-019	0.939 MMBtu/hr (134.1 hp) Diesel Emergency Generator, a 1993 Model Year compression ignition (CI) engine (Facility Reference: Collins Tank Farm Emergency Diesel Generator)
AA-021	0.188 MMBtu/hr (26.8 hp) Propane Emergency Generator, a 2010 Model Year 4- stroke lean burn (4SLB) engine (Facility Reference: Collins Injection Emergency Propane Generator)
AA-022	500 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> or Diesel Fuel) Skid Tank with Fixed Roof (Facility Reference: Gasoline Skid Tank 1 - GST-1)
AA-023	500 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> or Diesel Fuel) Skid Tank with Fixed Roof (Facility Reference: Gasoline Skid Tank 2 – GST-2)
AA-024	0.563 MMBtu/hr (80 hp) Propane Emergency Generator, a 2013 Model Year 4SLB engine (Facility Reference: Collins Tank Farm Emergency Propane Generator)
AA-025	Transmix Truck Loading Rack (Upon Certification of Construction)
AA-026	8,400,000 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof ( <b>Upon Certification of Construction</b> )
AA-027	8,400,000 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> ) Storage Tank with Internal Floating Roof ( <b>Upon Certification of Construction</b> )
AA-028	8,400,000 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> , Naphtha, Condensate, or Natural Gasoline) Storage Tank with Internal Floating Roof ( <b>Upon</b>

Emission Point	Description				
	Certification of Construction)				
AA-029	8,400,000 Gallon Refined Petroleum Fuels (Including Gasoline <sup>1</sup> , Naphtha, Condensate, or Natural Gasoline) Storage Tank with Internal Floating Roof ( <b>Upon</b> <b>Certification of Construction</b> )				
AA-030	126,000 Gallon Refined Petroleum Fuels (Including Transmix <sup>2</sup> but Excluding Gasoline <sup>1</sup> ) Process Tank with Internal Floating Roof. This tank is used as a surge tank. ( <b>Upon Certification of Construction</b> )				
AA-031	Tank Cleaning Process				
AA-032	0.304 MMBtu/hr (43.4 hp) Propane Fired Emergency Generator, a 2016 Model Year 4SLB engine (Facility Ref.: Kola Booster Station Emergency Generator)				

<sup>1</sup> Including Gasoline includes both "gasoline" defined in 40 CFR 63.11100 as a "petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines" and transmix

<sup>2</sup> Transmix does not meet the definition of "gasoline" as defined in 40 CFR 63.11110.

### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B.	Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
Facility- wide	Moderate Modification via 11 Miss. Admin. Code Pt. 2, R. 2.15.C and Title V Operating Permit issued May 19, 2017	3.B.1	VOC	236 tpy (12-month rolling basis)
	Title V Operating Permit issued January 27, 2010 and reissued May 19, 2017	3.B.2	Single HAP	9.9 tpy (12-month rolling basis)
			Total HAP	24.9 tpy (12-month rolling basis)
AA-015	40 CFR 60 Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids for Which construction,	3.B.3	VOC	Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	Reconstruction, or modification Commenced After May 18, 1978, and Prior to July 23, 1984			
AA-015	§60.112a(a)(2), Subpart Ka	3.B.4	VOC	Internal Floating Roof Requirements
AA-000 AA-001 through AA-006 AA-013 AA-014 AA-026 through AA-029	40 CFR 63 Subpart BBBBBB - NESHAP for Source Category Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.	3.B.5	НАР	Applicability
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-013 AA-014	\$63.11087(a) and (b) and Table 1.2(b), Subpart BBBBBB	3.B.6	НАР	Equip storage tank with an internal floating roof
AA-026 AA-027 AA-028 AA-029	§63.11087(f), Subpart BBBBBB	3.B.7	НАР	Comply with Subpart BBBBBB by complying with 40 CFR 60 Subpart Kb
AA-019 AA-021 AA-024 AA-032	40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	3.B.8	НАР	Applicability
AA-019	§63.6640(f)(1), Subpart ZZZZ	3.B.9	Operating Time	Limit non-emergency engine operation to 100 hours per year
AA-019 AA-021 AA-024 AA-032	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.10	РМ	0.6 lb/MMBTU, or as otherwise limited by facility modification restrictions

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-007 AA-008 AA-015 AA-016 AA-017 AA-018 AA-030 AA-009	Title V Operating Permit issued May 19, 2017	3.B.11	Storage Contents	Tanks may not store gasoline, as defined in §63.11100, but may store transmix Tanks may not store gasoline or transmix
AA-010 AA-011 AA-012				
AA-021 AA-024 AA-032	40 CFR 60 Subpart JJJJ – Standards for Performance for Stationary Spark Ignition Internal Combustion Engines	3.B.12	CO, NOx, VOC	Applicability Only
	§60.4233(d) and Table 1, Subpart JJJJ	3.B.13	NOx + HC	10 g/HP-hr
	§60.4233(d) and Table 1, Subpart JJJJ	3.B.14	СО	387 g/HP-hr
	§60.4243(d), Subpart JJJJ	3.B.15	Operating Time	Limit non-emergency engine operation to 100 hours per year
Facility- wide, including AA-022 and AA- 023	40 CFR 63 Subpart CCCCCC - NESHAP for Source Category Gasoline Dispensing Facilities	3.B.16	НАР	Applicability
AA-026 AA-027 AA-028 AA-029	40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	3.B.17	VOC	Applicability
	§60.112b(a)(1), Subpart Kb	3.B.18	VOC	Install a fixed roof in combination with an internal floating roof
AA-025 AA-026 AA-027 AA-028 AA-029 AA-030	Moderate Modification via 11 Miss. Admin. Code Pt. 2, R. 2.15.C and Title V Operating Permit issued May 19, 2017	3.B.19	VOC	Authority to Construct

- 3.B.1 Upon permit issuance, the permittee shall limit facility-wide VOC emissions to 236 tpy as determined for each consecutive 12-month period. (Ref.: Moderate Modification via 11 Miss. Admin. Code Pt. 2, R. 2.15.C and Title V Operating Permit issued May 19, 2017)
- 3.B.2 The permittee shall limit facility-wide HAP emissions to 9.9 tpy of each individual HAP and 24.9 tpy for total combined HAPs, as determined for each consecutive 12-month period. (Ref.: Title V Operating Permit issued January 27, 2010)
- 3.B.3 Emission Point AA-015 is subject to and shall comply with the applicable requirements of 40 CFR 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984 and the applicable General Provisions found in 40 CFR 60 Subpart A. (Ref.: §60.110a, Subpart Ka and 40 CFR 60 Subpart A)
- 3.B.4 For Emission Point AA-015, the storage vessel shall be equipped with a fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, 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. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being floated off the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting. (Ref.: §60.112a(a)(2), Subpart Ka)
- 3.B.5 Emission Points AA-000, AA-001 through AA-006, AA-013, AA-014, and AA-026 through AA-029 are subject to and shall comply with 40 CFR 63, Subpart BBBBBB, the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and the applicable General Provisions in 40 CFR Part 63, Subpart A. (Ref.: §63.11081(a)(2), Subpart BBBBBB)
- 3.B.6 For Emission Points AA-001 through AA-006 and AA-013 through AA-014, the permittee must equip each internal floating roof gasoline storage tank according to the requirements in §60.112b(a)(1), except for the secondary seal requirements under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix). (Ref.: §63.11087(a) and (b) and Table1.2(b), Subpart BBBBBB)
- 3.B.7 Upon certification of construction, Emission Points AA-026 through AA-029 shall be subject to and shall comply with the control requirements in 40 CFR 60, Subpart Kb; therefore, these storage tanks are deemed in compliance with 40 CFR 63, Subpart BBBBBB. (Ref.: §63.11087(f), Subpart BBBBBB)

3.B.8 Emission Points AA-019, AA-021, AA-024 and AA-032 are subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Emission Point AA-019 is an existing emergency stationary RICE located at an area source of HAPs and is required to meet the applicable requirements of this standard and the applicable General Provisions in 40 CFR Part 63, Subpart A.

Emission Points AA-021, AA-024, and AA-032 are new emergency stationary RICE located at an area source that must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply under Subpart ZZZZ. (Ref.: §63.6585 and §63.6590(c)(1), Subpart ZZZZ)

- 3.B.9 For Emission Points AA-019, the permittee shall operate the emergency stationary RICE according to the requirements below. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to the requirements below, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
  - (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
  - (b) The permittee may operate the emergency stationary RICE for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this section counts as part of the 100 hours per calendar year allowed. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
  - (c) Emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Except as provided in §63.6640(f)(2), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: §63.6640(f), Subpart ZZZZ)

- 3.B.10 For Emission Points AA-019, AA-021, AA-024 and AA-032, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)
- 3.B.11 Emission Points AA-007, AA-008, AA-015 through AA-018, and AA-030 may store transmix but shall not store gasoline as defined in §63.11100. Gasoline shall not be transferred using the loading rack, Emission Point AA-025. Emission Points AA-009 through AA-012 shall not store gasoline or transmix. (Note: "Transmix" does not meet the definition of gasoline in §63.11100.) (Ref.: Title V Operating Permit issued May 19, 2017)
- 3.B.12 Emission Points AA-021, AA-024, and AA-032 are emergency stationary spark ignition (SI) internal combustion engines (ICE) manufactured after January 1, 2009, that have a maximum engine power greater than 25 HP and are lean burn engines fueled by liquefied petroleum gas (LPG); therefore, the permittee shall comply with all applicable requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines 40 CFR Part 60, Subpart JJJJ and the applicable General Provisions in NSPS Subpart A. (Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)
- 3.B.13 For, Emission Points AA-021, AA-024, and AA-032, the permittee shall have exhaust emissions of NOx + HC less than 10 g/HP-hr. (Ref.: 40 CFR 60.4233(d) and Table 1, Subpart JJJJ)
- 3.B.14 For, Emission Points AA-021, AA-024, and AA-032, the permittee shall have exhaust emissions of carbon monoxide (CO) less than 387 g/HP-hr. (Ref.: 40 CFR 60.4233(d) and Table 1, Subpart JJJJ)
- 3.B.15 For Emission Points AA-021, AA-024, and AA-032, the permittee shall operate the emergency stationary ICE according to the requirements below. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to the requirements below, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
  - (a) There is no time limit on the use of emergency stationary ICE in emergency situations.
  - (b) The permittee may operate the emergency stationary ICE for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the DEQ for approval of additional hours

to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Except as provided in §60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: §60.4243(d), Subpart JJJJ)

- 3.B.16 The facility is subject to and shall comply with 40 CFR 63, Subpart CCCCCC, the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities and the applicable General Provisions in 40 CFR 63, Subpart A. (Ref.: §63.11081(a) and (b), Subpart CCCCCC)
- 3.B.17 Upon certification of construction, Emission Points AA-026, AA-027, AA-028, and AA-029 are subject to and shall comply with the applicable requirements of 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and the applicable General Provisions found in 40 CFR 60, Subpart A. (Ref.: §60.110b(a), Subpart Kb)
- 3.B.18 Upon certification of construction, the permittee shall equip Emission Points AA-026, AA-027, AA-028, and AA-029 with a fixed roof in combination with an internal floating roof meeting the specifications of §60.112b(1)(i) through (ix). (Ref.: §60.112b(a)(1), Subpart Kb)
- 3.B.19 For Emission Points AA-025 through AA-030, the permittee is authorized to begin actual construction of these emission units upon permit issuance. (Ref.: Moderate Modification via 11 Miss. Admin. Code Pt. 2, R. 2.15.C and Title V Operating Permit issued May 19, 2017)

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	РМ	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU

#### C. Insignificant and Trivial Activity Emission Limitations & Standards

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

#### D. <u>Work Practice Standards</u>

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-000 AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-013 AA-014 AA-026 AA-027 AA-028 AA-029	§63.11085(a), Subpart BBBBBB	3.D.1	O & M Procedures	Operation maintenance procedures
AA-019	<pre>§63.6603(a), 63.6625(i), and Table 2d, Subpart ZZZZ</pre>	3.D.2	Maintenance Requirements	Change oil and filter every 500 hours or operation or annually; inspect air cleaner every 1,000 hours of operation or annually; and inspect all hoses and belts every 500 hour of operation or annually.
Facility- wide, including	§63.11115(a), Subpart CCCCCC	3.D.3	O & M Requirements	Good air pollution control practices
AA-022 and AA-	§63.11116, Subpart	3.D.4		Work practices for gasoline handling

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
023	CCCCCC			

- 3.D.1 For Emission Points AA-000, AA-001 through AA-006, AA-013 through AA-014, and AA-026 through AA-029, the permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, subscription, Subpart BBBBBB)
- 3.D.2 For Emission Point AA-019, the permittee shall:
  - (a) Change oil and filter every 500 hours of operation or annually, whichever comes first or utilize an oil analysis program as described in 63.6625(i) to extend the life of the oil;
  - (b) Inspect air cleaner every 1,000 hours of operation or annually, and replace as necessary; and
  - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(Ref.: §63.6603(a), 63.6625(i) and Table 2d(4), Subpart ZZZZ)

- 3.D.3 For Emission Points AA-022 and AA-023, the permittee must at all times, operate and maintain the gasoline storage tanks, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (Ref.: §63.11115(a), Subpart CCCCCC)
- 3.D.4 The permittee shall comply with the following requirements for gasoline dispensing:
  - (a) The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- (1) Minimize gasoline spills;
- (2) Clean up spills as expeditiously as practicable;
- (3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
- (4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- (b) The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of Part 63, but must have records available within 24 hours of a request by the DEQ to document gasoline throughput.
- (c) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

(Ref.: §63.11116, Subpart CCCCCC)

#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), and (d).)

# 4.3 For Emission Points AA-025 through AA-030, the permittee shall comply with the permit requirements herein upon certification of construction for each emission point.

(a) The authority to construct Emission Points AA-025 through AA-030 will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

(b) Emission Points AA-025 through AA-030 cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

### SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

#### A. <u>General Monitoring, Recordkeeping and Reporting Requirements</u>

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below. (Ref.: 11 Miss. Admin. Code Pt. 2. R. 6.3.A(3).)
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within

fifteen (15) days following the end of the month in which the deviation was discovered. (Ref.: 11 Miss. Admin. Code Pt. 2. R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA. (Ref.: 11 Miss. Admin. Code Pt. 2. R. 6.3.A(3).)
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: 11 Miss. Admin. Code Pt. 2. R. 6.3.A(3).)

B.	Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).	5.B.1	VOC, Individual HAP & Total Combined HAP	Calculate and record 12-month rolling total
AA-015	§60.115a(a), Subpart Ka	5.B.2	Petroleum Liquid	Records of petroleum liquid stored, the period of storage, and maximum true vapor pressure
AA-001 AA-002 AA-003 AA-004 AA-005 AA-005 AA-006 AA-013 AA-014	<pre>\$63.11087(c) and \$63.11092(e)(1), Subpart BBBBBB</pre>	5.B.3	Tank Roof Inspections	Internal Floating Roof Monitoring
	§63.11087(e) and §63.11094(a), Subpart BBBBBB	5.B.4		Internal Floating Roof Recordkeeping
AA-000	§63.11089(a)-(d), Subpart BBBBBB	5.B.5	Leak Detection and Repair	Leak Detection Monitoring/Recordkeeping
	\$63.11089(g) \$63.11094(d), Subpart BBBBBB	5.B.6		Leak Detection Recordkeeping
	§ 63.11089(g) § 63.11094(e), Subpart BBBBBB	5.B.7		Leak Detection Log Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-019	§63.6625(e), Subpart ZZZZ	5.B.8	НАР	Maintenance
	§63.6625(f), Subpart ZZZZ	5.B.9		Install non-resettable hour meter
	§63.6625(h), Subpart ZZZZ	5.B.10		Minimize idle and startup time
	§63.6605, Subpart ZZZZ	5.B.11		Continuous Compliance and good air pollution control practices
	§63.6655(e) and (f), Subpart ZZZZ	5.B.12		Recordkeeping
	§63.6660, Subpart ZZZZ	5.B.13		Recordkeeping
AA-021 AA-024 AA-032	§60.4243(b)(1), Subpart JJJJ	5.B.14	NOx + HC, CO	Comply by purchasing certified engine or conducting performance test
	§60.4245(a), Subpart JJJJ	5.B.15		Recordkeeping
	<ul> <li>§60.4245(b), Subpart</li> <li>JJJJ, and 11 Miss.</li> <li>Admin. Code Pt. 2, R.</li> <li>6.3.A(3)(a)(2)</li> </ul>	5.B.16		Install non-resettable hour meter and record hours of operation and reason for operation
Facility- wide and AA-022 AA-023	§63.11111(e), Subpart CCCCCC	5.B.17	Fuel Throughput	Monitor monthly throughput
141-025	\$63.11115(b) and \$63.11125(d)(1) and (2), Subpart CCCCCC	5.B.18	Malfunctions	Malfunction recordkeeping
AA-001 through AA-018 AA-022 AA-023 AA-026 through AA-030	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).	5.B.19	Petroleum liquid	Records of petroleum liquid stored, the period of storage, monthly throughput, and maximum true vapor pressure.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-026 AA-027 AA-028 AA-029	§60.113b(a)(1)-(4), Subpart Kb	5.B.20	Tank Inspections	Initial and subsequent (5- or 10-year) inspections of tank roof and components
	§60.115b(a)(2), Subpart Kb	5.B.21	Tank Inspection Records	Records of tank inspections maintained for five (5) years
	§60.116b(a) and (b), Subpart Kb	5.B.22	Tank Dimensions/ Capacity	Maintain records of tank dimensions and capacity for life of tank
	§60.116b(d) and (e), Subpart Kb	5.B.23	VOL Stored	Maintain records of VOL stored, period of storage, and maximum true vapor pressure

- 5.B.1 To demonstrate compliance with the Facility-Wide Emissions Limits, the permittee shall calculate the monthly VOC, individual HAP, and total combined HAP emission rates and the annual emission rates in tons/year, determined for each consecutive 12-month period. The permittee shall use actual test data, manufacturers data, and/or emission factors or methodology used in the Title V application to calculate monthly emissions. EPA's TANKS 4.09 program may be used to calculate emissions; however, emissions associated with landing and subsequent filling of floating roof tanks must be accounted for, as well as tank cleanings. An alternative deck seam loss factor of 0.0085 lb-mole/ft-year may be used as approved in the letter attached in Appendix C. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).)
- 5.B.2 For Emission Point AA-015, the permittee shall maintain a record of the petroleum liquid stored, period of storage, and maximum true vapor pressure of that liquid during the respective storage period in accordance with the methods specified in §60.115a. (Ref.: §60.115a(a), Subpart Ka)
- 5.B.3 Beginning January 10, 2011 (except as provided in §63.11087(b)), for Emission Points AA-001 through AA-006, AA-013 and AA-014, the gasoline storage tanks subject to the emission standards in §63.11087(a), the permittee must perform inspections of the floating roof system according to the requirements of §60.113b(a). For Emission Points AA-002 and AA-013, the permittee may comply with the Alternative Monitoring Plan as approved by EPA on August 2, 2013 and attached as Appendix D. (Ref.: §63.11087(c) and §63.11092(e)(1), Subpart BBBBBB)
- 5.B.4 Beginning January 10, 2011 (except as provided in 63.11087(b)), for Emission Points AA-001 through AA-006, AA-013 and AA-014, the permittee shall keep records as specified in §60.115b, except records shall be kept for 5 years. (Ref.: §63.11087(e) and §63.11094(a), Subpart BBBBBB).
- 5.B.5 For Emission Point AA-000, the permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. A log book shall be used and

shall be signed by the permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.

Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The permittee shall provide in the semiannual report specified §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. (Ref.: §63.11089(a) through (d), Subpart BBBBBB)

- 5.B.6 For Emission Point AA-000, the permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. (Ref.: \$63.11089(g) and \$63.11094(d), Subpart BBBBBB)
- 5.B.7 For Emission Point AA-000, the permittee shall record in the log book for each leak that is detected, the information specified in the list below:
  - (a) The equipment type and identification number;
  - (b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
  - (c) The date the leak was detected and the date of each attempt to repair the leak;
  - (d) Repair methods applied in each attempt to repair the leak;
  - (e) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
  - (f) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
  - (g) The date of successful repair of the leak.
  - (Ref.: §63.11089(g) and §63.11094(e))
- 5.B.8 For Emission Point AA-019, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Ref.: §63.6625(e)(3), Subpart ZZZZ)
- 5.B.9 For Emission Point AA-019, the permittee shall install a non-resettable hour meter if one is not already installed. (Ref.: §63.6625(f), Subpart ZZZZ)

- 5.B.10 For Emission Point AA-019, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. (Ref.: §63.6625(h), Subpart ZZZZ)
- 5.B.11 For Emission Points AA-019, the permittee shall comply with the following:
  - (a) The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply at all times.
  - (b) At all times the permittee must operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (Ref.: §63.6605, Subpart ZZZZ)
- 5.B.12 For Emission Point AA-019, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE according to the maintenance plan.

The permittee shall keep the following records:

- (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
- (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- (c) Records of all required maintenance performed on the air pollution control and monitoring equipment.
- (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- (e) Records of the hours of operation of the engine that is recorded through the nonresettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how

many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as a part of demand response.

(Ref.: §63.6655(a), (e), and (f), Subpart ZZZZ)

- 5.B.13 For Emission Point AA-019, the permittee must meet the following recordkeeping requirements:
  - (a) Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).
  - (b) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - (c) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

(Ref.: §63.6660, Subpart ZZZZ)

- 5.B.14 For Emission Points AA-021, AA-024, and AA-032, the permittee shall demonstrate compliance with the emission standards specified in §60.4233(d) according to one of the methods specified in paragraphs (1) and (2) of this condition
  - (a) Purchasing an engine certified according to procedures specified in 40 CFR Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in §60.4243(a). If the permittee operates and maintains the certified engine according to the manufacturer's emission-related written instructions, compliance may be demonstrated by keeping records of conducted maintenance, and no performance testing is required. If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance according to §60.4243(a)(2)(iii).
  - (b) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in §60.4233(d) and according to the requirements specified in §60.4244, as applicable, and according to the following:
    - (1) The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing

emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance.

(Ref.: §60.4243(b)(1), Subpart JJJJ)

- 5.B.15 For Emission Points AA-021, AA-024, and AA-032, the permittee shall keep records of the following:
  - (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
  - (b) Maintenance conducted on the engine.
  - (c) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
  - (d) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 60.4243(a)(2), documentation that the engine meets the emission standards.

(Ref.: §60.4245(a), Subpart JJJJ)

- 5.B.16 For Emission Points AA-021, AA-024, and AA-032, the permittee shall install a nonresettable hour meter and shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (Ref.: §60.4245(b), Subpart JJJJ, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))
- 5.B.17 The permittee shall demonstrate that their monthly throughput for gasoline dispensing is less than the 10,000-gallon threshold level. The permittee shall keep records to document monthly throughput. Records required under this paragraph shall be kept for a period of 5 years. (Ref.: §63.11111(e), Subpart CCCCCC)
- 5.B.18 For the gasoline dispensing facility and associated storage tanks, the permittee shall keep the following records:
  - (a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning

process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: §63.11115(b), §63.11125(d)(1) and (2), Subpart CCCCCC)

- 5.B.19 For Emission Points AA-001 through AA-018, AA-022, AA-023, and AA-026 through AA-030, the permittee shall maintain monthly records of the following for each tank: the type of petroleum liquid stored, the period of storage and monthly throughput for each petroleum liquid, and the vapor pressure of the petroleum liquid at the storage temperature. This information shall be recorded for each month and used to demonstrate compliance with the rolling 12-month ton/year emission limits, as required by Condition 5.B.1. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b))
- 5.B.20 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall comply with the following tank inspections:
  - (a) 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 permittee shall repair the items before filling the storage vessel.
  - (b) 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 permittee shall repair the items or empty and remove the storage vessel from service within 45 days.
  - (c) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
    - (1) Visually inspect the vessel as specified in paragraph (d) at least every 5 years; or
    - (2) Visually inspect the vessel as specified in paragraph (b) of this section.
  - (d) 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 permittee 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 paragraphs (b) and (c)(2) and at intervals no greater than 5 years in the case of vessels specified in paragraph (c)(1).

(Ref.: §60.113b(a)(1)-(4), Subpart Kb)

- 5.B.21 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall keep a record of each inspection performed as required by §60.113b(a)(1)-(4) (i.e., Condition 5.B.20) in accordance with Condition 5.A.3. 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). (Ref.: §60.115b(a)(2), Subpart Kb)
- 5.B.22 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source. (Ref.: §60.116b(a) and (b), Subpart Kb)
- 5.B.23 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be kept for five (5) years as specified in Condition 5.A.3. The maximum true vapor pressure shall be determined per the procedures in §60.116b(e). (Ref.: §60.116b(d) and (e), Subpart Kb)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)	5.C.1	VOC, Individual HAP, Total Combined HAP	Semiannual Emissions Report
AA-000 AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-013 AA-014	§63.11087(e), §63.11095(a)(1) and (3), Subpart BBBBBB	5.C.2	Leak Detection and IFR Inspections	Semiannual Compliance Report
AA-000	\$63.11089(g) and \$63.11095(b)(5) and (c),	5.C.3	Leak Detection Repair	Excess Emissions Report

#### C. <u>Specific Reporting Requirements</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
	Subpart BBBBBB			
AA-000 AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-013 AA-014 AA-026 AA-027 AA-028 AA-029	\$63.11089(g) and \$63.11095(d), Subpart BBBBBB	5.C.4	Malfunctions	Semiannual Malfunction Report
AA-019	Footnote 2 to Table 2d of Subpart ZZZZ	5.C.5	Work Practices	Report any failure to perform the management practice on the required schedule
AA-026 AA-027 AA-028	§60.7(a)(1) and (3), Subpart A	5.C.6	Notifications	Notification of commencement of construction and startup
AA-028 AA-029	§63.9(h) and Table 3 to Subpart BBBBBB	5.C.7	Notification of Compliance Status	Submit notification of compliance status within 60 days of initial compliance date
	§60.113b(a)(5), Subpart Kb	5.C.8	Notifications	Notify DEQ 30 days prior to filling or refilling the storage vessel
	§60.115b(a)(1), Subpart Kb	5.C.9	Initial inspection report	Submit a report describing initial inspection with notification of startup
	§60.115b(a)(3), Subpart Kb	5.C.10	Defects	Notification within 30 days of annual inspection showing equipment defects
	§60.115b(a)(4), Subpart Kb	5.C.11	Defects	Notification within 30 days of 5- or 10-year inspection showing equipment defects
AA-025 AA-026 AA-027	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2)	5.C.12	Notifications	Notification within 15 days of beginning of actual construction
AA-028 AA-029 AA-030	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3)	5.C.13	Notifications	Notification when construction does not begin within 18 months or when construction is suspended for 18 months or more
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1)	5.C.14	Notifications	Certification of completion of construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2)	5.C.15	Notifications	Notification of any change in construction from the previously approved plans and specifications and permit

- 5.C.1 The permittee shall submit semi-annual reports providing the total VOC emission rate, the emission rate of each individual HAP, and the total combined HAP emission rate in tons/year for each consecutive 12-month period. The reports shall be submitted in accordance with the requirements set forth in Condition 5.A.4 of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c))
- 5.C.2 The permittee shall submit the following information to the DEQ in the semiannual compliance report:
  - (a) For Emission Points AA-001 through AA-006 and AA-013 through AA-014, the information specified in §60.115b(a).
  - (b) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection.

(Ref.: §63.11087(e) and §63.11095(a)(1) and (3), Subpart BBBBBB)

- 5.C.3 For Emission Point AA-000, the permittee shall submit an excess emissions report to the DEQ at the time the semiannual compliance report is submitted. An excess emissions event is each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection. The excess emission report must include the following information:
  - (a) The date on which the leak was detected;
  - (b) The date of each attempt to repair the leak;
  - (c) The reasons for the delay of repair; and
  - (d) The date of successful repair.

If no excess emission event has occurred during the previous 6-month period, no report is required.

(Ref.: §63.110089(g) and §63.11095(b)(5) and (c), Subpart BBBBBB)

5.C.4 For Emission Points AA-000 through AA-006, AA-013, AA-014, and AA-026 through AA-029, the permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by a permittee during a malfunction of an affected source to minimize emissions in accordance with §63.11085(a), including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report. (Ref.: §63.110089(g) and §63.11095(d), Subpart BBBBBB)

- 5.C.5 For Emission Point AA-019, if the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. (Ref.: Footnote 2 to Table 2d of Subpart ZZZZ)
- 5.C.6 For Emission Points AA-026 through AA-029, the permittee shall submit the following notifications:
  - (a) A notification of the date construction commenced postmarked no later than 30 days after such date.
  - (b) A notification of the actual date of initial startup postmarked within 15 days after such date.

(Ref.: §60.7(a)(1) and (3), Subpart A)

- 5.C.7 For Emission Points AA-026 through AA-029, the permittee shall submit the Notification of Compliance Status required by §63.9(h). (Ref.: §63.9(h) and Table 3 to Subpart BBBBBB)
- 5.C.8 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall notify DEQ in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required to afford the DEQ the opportunity to have an observer present. If the inspection required is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the DEQ 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 DEQ at least 7 days prior to the refilling. (Ref.: §60.113b(a)(5), Subpart Kb)
- 5.C.9 Upon certification of construction for Emission Points AA-026 through AA-029, the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3) (Permit Condition 5.C.6(b)). (Ref.: §60.115b(a)(1), Subpart Kb)

- 5.C.10 Upon certification of construction for Emission Points AA-026 through AA-029, if any of the conditions described in §60.113b(a)(2) (i.e., Condition 5.B.20(b)) are detected during the annual visual inspection, a report shall be furnished to the DEQ 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. (Ref.: §60.115b(a)(3), Subpart Kb)
- 5.C.11 Upon certification of construction for Emission Points AA-026 through AA-029, after each inspection required by §60.113b(a)(3) (i.e., Condition 5.B.20(c)) 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 §60.113b(a)(3)(ii), a report shall be furnished to the DEQ within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made. (Ref.: §60.115b(a)(4), Subpart Kb)
- 5.C.12 For Emission Points AA-025 through AA-030, within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- 5.C.13 For Emission Points AA-025 through AA-030, the permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- 5.C.14 For Emission Points AA-025 through AA-030, upon the completion of construction, the permittee shall notify MDEQ that construction was performed in accordance with the approved plans and specifications. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)
- 5.C.15 The permittee shall promptly notify MDEQ in writing of any change in construction from the previously approved plans and specifications and permit. If the changes are deemed substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

# SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <u>http://ecfr.gpoaccess.gov</u> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H Halon Emissions Reduction:
  - (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

# **APPENDIX** A

# List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control
	of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air
	Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title
,, _,, _	V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the
,	Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
НАР	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR
NESTIM	61 or National Emission Standards for Hazardous Air Pollutants, 40 Cf R
	Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
$PM_{10}$	Particulate Matter less than 10 $\mu$ m in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SII SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VEE VHAP	Volatile Hazardous Air Pollutant
VIIAr VOC	Volatile Organic Compound
	volatile Organic Compound

## **APPENDIX B**

### List of Regulations Referenced in this Permit

11 Miss. Admin. Code Part 2, Chapter 1 – Mississippi Commission on Environmental Quality, Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Adopted May 8, 1970 and Last amended November 10, 2016)

11 Miss. Admin. Code Part 2, Chapter 6 – Mississippi Commission on Environmental Quality, Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Adopted October 27, 1993, Last Amended June 28, 2012)

Title VI of the Clean Air Act – Stratospheric Ozone Protection

40 CFR 63 Subpart BBBBBB – National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR 60 Subpart A – Standards of Performance for New Stationary Source General Provisions Notification and Recordkeeping

40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984.

40 CFR 60 Subpart JJJJ – Standards for Performance for Stationary Spark Ignition Internal Combustion Engines

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

40 CFR 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

The full text of the federal regulations referenced in this permit may be found on-line at <u>http://www.ecfr.gov</u> under Title 40. The full text of the state regulations may be found at <u>http://deq.state.ms.us</u> or MDEQ will provide a copy upon request from the permittee.

# **APPENDIX C**

# APPROVAL OF DECK SEAM LOSS FACTOR (APRIL 10, 2013)

1817 PER20140001

Draft/Proposed



#### STATE OF MISSISSIPPI

#### Phil Bryant Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

April 10, 2013

Mr. William "Randy" Smith Environmental Manager Colonial Pipeline Company PO Box 1298 Collins, MS 39428

Dear Mr. Smith:

Re: Colonial Pipeline Company, Collins Complex Allentech Alternate Deck Seam Loss Factor Air Ref. No.0640-00013 Covington County

We received your request on September 25, 2012, for approval of an alternate deck seam loss factor for Colonial tanks using Allentech honeycomb deck design with bolted seams that include elastomeric gasket material. This correspondence is to inform you that we approve the alternate decks seam loss factor of 0.0085 lb-mole/ft-year per unit seam length factor. This approval is based on the testing information submitted by Colonial Pipeline on September 25, 2012.

Please notate in each permit application if an alternate decks seam loss factor is being used and reference this approval letter. If you have any questions, please do not hesitate to contact me at (601) 961-5239.

Sincerely,

Bryan D. alto

Bryan D. Collins, P.E., DEE Chief, Energy and Transportation Branch - EPD

cc: Jamie Godbold, Environ

1817 PER20090001

## **APPENDIX D**

ALTERNATIVE MONITORING PLAN REQUEST FOR INTERNAL FLOATING ROOF STORAGE TANKS SUBJECT TO NEW SOURCE PERFORMACNE STANDARDS (NSPS) SUBPART Kb AND NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) SUBPARTS R AND BBBBBB (APRIL 10, 2013)

Draft/Proposed

1817 PER20140001

Misc- 2013

cc: M. RAO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

AUG 2 2013

RECEIVED AUG 2 6 2013 Dept. of Environmental Quality

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Tom J. Kelly Corporate Environmental Compliance Manager Colonial Pipeline Company 1185 Sanctuary Parkway, Suite 100 Alpharetta, Georgia 30004-4738

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Re: Alternative Monitoring Plan Request for Internal Floating Roof Storage Tanks Subject to New Source Performance Standards (NSPS) Subpart Kb and National Emission Standards for Hazardous Air Pollutants (NESHAP) Subparts R and BBBBBB

Dear Mr. Kelly:

This letter is in response to your April 22, 2013, Alternative Monitoring Plan (AMP) Request, pursuant to 40 C.F.R. §§60.13(i) and 63.8(f) of the Part 60 and 63 General Provisions, to the Office of Enforcement and Compliance Assurance (OECA) at the United States Environmental Protection Agency (EPA). In your request, you seek EPA approval of Colonial Pipeline Company's (Colonial) alternative top-side only inspection methodology for your internal floating roof (IFR) storage tanks. Specifically, you request that EPA allow Colonial to conduct top-side in-service inspections to meet the internal out-of-service inspection requirements for your IFR storage tanks at certain facilities subject to the following regulations:

Two facilities with three tanks subject to 40 C.F.R. Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (GD MACT);

Nine facilities with 59 tanks subject to 40 C.F.R. Part 63, Subpart BBBBBB -National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (GD GACT); and

One facility (included in GD GACT facilities above) with two tanks subject to 40 C.F.R. Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (NSPS Subpart Kb). The AMP request includes a total of 64 tanks at 12 facilities located in seven states. [See Enclosure.] We discuss your request and our decision below.

### **Regulatory Requirements**

The NSPS Subpart Kb internal out-of-service inspection requirements at 40 C.F.R. 60.113b are applicable to all of Colonial's IFR storage tanks covered by this request. NSPS Subpart Kb requires owners and operators of IFR storage tanks to:

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 paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.

### 40 C.F.R. 60.113b(a)(4).

These NSPS Subpart Kb requirements are cross-referenced in the GD MACT and GD GACT regulations as follows:

- In the GD MACT, 40 C.F.R. 63.425(d) requires: "... the owner or operator of each gasoline storage vessel ... shall comply with §60.113b of this chapter."
- In the GD GACT, 40 C.F.R. 63.11092(e)(1) requires owners or operators to "... perform inspections of the floating roof system according to the requirements of §60.113b(a) if you are complying with option 2(b) in Table 1 to this subpart...."

We evaluate Colonial's AMP request under 40 C.F.R. §§60.13(i) and 63.8(f), which govern the submittal and approval of NSPS and NESHAP AMP requests. Under the NSPS, §60.13(i) states: "After receipt and consideration of written application, the Administrator may approve alternatives to any monitoring procedures or requirements of this part. . . ." Section 60.13(i) provides no further requirements regarding submission or approval of the AMP. Under the NESHAP, §63.8(f)(2) states: "After receipt and consideration of written application, the Administrator may approve alternatives to any monitoring methods or procedures of this

part...." Section 63.8(f)(4) indicates what the application must contain: description of the proposed alternative monitoring system, including the four elements in the definition of "monitoring" in §63.2; and information justifying the alternative monitoring request, such as the technical or economic infeasibility, or the impracticality of the affected source using the required method. Section 63.8(f)(5) provides how EPA will process the request. For both NSPS and NESHAP AMP requests, EPA evaluates whether the alternative monitoring option proposed is at least as stringent as the applicable underlying rule requirements.

### Colonial's Proposed AMP

The Colonial AMP request covers certain IFR storage tanks with uniform and specific roof, deck, and seal configurations. Specifically, Colonial's request only includes IFR storage tanks that "... are full contact, aluminum honeycomb panel constructed decks with mechanical shoe primary and secondary seals in tanks with geodesic dome roofs." The geodesic dome roofs are "... equipped with skylights for enhanced natural lighting for topside in-service deck inspections." In its request, Colonial asks that the EPA approve a top-side in-service internal inspection procedure as an acceptable alternative to the out-of-service internal inspection requirements under GD MACT, GD GACT, and NSPS Kb. Specifically, Colonial asks that the EPA approve the following top-side in-service internal inspection procedures:

- If a GD MACT, GD GACT, or NSPS Kb tank included in this • request has not been emptied and degassed within the applicable 5 or 10-year period, Colonial will conduct the internal inspection on the tank while it is in service. This means that Colonial will perform the internal inspection entirely from the top-side of the floating roof. Absent an independent need to empty or degas the tank for some reason other than the Kb internal inspection. Colonial will then not perform the Kb internal inspection for another 5 or 10 years, as applicable. Each time a GD MACT. GD GACT, or NSPS Kb IFR tank included in this AMP request is emptied and degassed, however, Colonial will perform an internal inspection while the tank is out-of-service as required under Subpart Kb, 40 C.F.R. §60.113b(a)(4). A full top-side and bottom side inspection of the deck and seals will be conducted whenever the tank is emptied and degassed for maintenance or integrity assessments. Based on the average API 653 inspection interval, these emptied and degassed out-of-service events would typically occur every 20 years.
- While performing an in-service internal inspection, Colonial will also measure seal gaps on its GD MACT, GD GACT, or NSPS Kb tanks included in this request. For the seals, Colonial will document the following:
  - a. The location and dimensions of any seal gaps in both the primary and secondary seals that are

greater than 1/8 inches in width (gap between the seal and the tank wall).

- b. The location and dimension of any holes, tears, or other openings in the seal fabric of either the primary or secondary seals.
- The following conditions would constitute inspection failure under a top-side in-service internal inspection:
  - a. Stored liquid on the floating roof.
  - b. Holes or tears in the primary or secondary seal (if one is present).
  - c. Floating roof deck, deck fittings, or rim seals that are not functioning as designed, as specified in Subpart Kb, 40 C.F.R. §60.112b(a)(1)(i)-(ix).
  - d. Failure to comply with the operational requirements of Subpart Kb, 40 C.F.R. §60.112b(a)(1)(i)-(ix).
  - e. Gaps of more than 1/8 inch between any deck fitting gasket, seal, or wiper and any surface that it is intended to seal.
- If failures are detected during an in-service internal inspection, Colonial will comply with the reporting requirements of 40 C.F.R. §60.115b(a)(3), except that records will be kept for at least 5 years consistent with the underlying GD GACT and GD MACT regulations. Colonial will also comply with the reporting and recordkeeping requirements under 40 C.F.R. §60.115b(a)(2) through (4) for seal gap measurements, as applicable, except that records will be kept for at least 5 years consistent with the underlying GD GACT and GD MACT regulations.
- If any of the inspection failure conditions identified above are detected during an in-service internal inspection, Colonial will comply with the repair requirements of 40 C.F.R. §60.113b(a)(2), which would require Colonial to repair the items or remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30 day extension may be requested if the failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested in the inspection report required in 40 C.F.R. §60.115b(a)(3).

### **EPA Conclusions**

Based on the tank data and the inspection procedures described in Colonial's AMP request, EPA has determined under 40 C.F.R. §§60.13(i) and 63.8(f) that the specified IFR storage tanks can be properly inspected and repaired with your proposed top-side in-service internal inspection methodology. [See Enclosure.] During an internal inspection of an IFR storage tank under NSPS Subpart Kb, an owner or operator must be able to see, inspect, and repair all of the IFR deck components, including the primary and secondary mechanical seals, gaskets, and slotted membranes. Colonial's AMP satisfies this requirement. Colonial's top-side in-service internal inspections will only be implemented on the IFR storage tanks described in the AMP request. These are IFR storage tanks that are constructed of uniform and specific roof, deck and seal configurations; specifically, these IFR storage tanks have geodesic dome roofs equipped with skylights for enhanced natural lighting and aluminum honeycomb panel decks in full contact with the stored liquid surface. The configuration of these particular types of IFR storage tanks will enable Colonial to have visual access to all of the requisite components through the top side of the IFR storage tanks while the IFR storage tanks are still in service. Additionally, the configuration of these particular types of IFR storage tanks will enable Colonial to properly inspect and repair the requisite components on these IFR storage tanks while the IFR storage tanks are still in service, consistent with the inspection and repair requirements established under NSPS Subpart Kb.

Colonial's top-side in-service internal inspection methodology also includes more stringent requirements than would otherwise be applicable to the IFR storage tanks specified in the AMP request. For example, Colonial has agreed to identify and address any "... gaps of more than 1/8 inch between any deck fitting gasket, seal, or wiper and any surface that it is intended to seal...", instead of complying with the less rigorous visual inspection requirements under NSPS Subpart Kb for which a measurement criterion is not established. [See 40 C.F.R. 60.113b(a)(4).] This gap measurement criterion for inspection failure at IFR storage tanks is appropriate as it has been approved by the Agency under 40 C.F.R. Part 63, Subpart WW. [See 40 C.F.R. 63.1063(d)(1).]<sup>1</sup> Additionally, Colonial has agreed to comply with the fitting and deck seal requirements and the repair timeframe requirement in NSPS Subpart Kb. [See 40 C.F.R. 60.113b(a)(1).] These provisions do not normally apply to Colonial's IFR storage tanks that are subject to the GD GACT.

<sup>&</sup>lt;sup>1</sup> In Section 63.1063(d)(1) of 40 C.F.R. Part 63, Subpart WW, National Emissions Standards for Storage Vessels (Tanks)-Control Level 2, it states: "Floating roof (IFR and EFR) inspections shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in paragraph (a) of this section. Any of the conditions described in paragraphs (d)(1)(i) through (d)(1)(v) of this section constitutes inspection failure." The condition for inspection failure in 40 C.F.R. 1063(d)(1)(v) states that "... gaps of more than 0.32 centimeters (1/8 inch) between any deck fitting gasket, seal, or wiper (required by paragraph (a) of this section) and any surface that it is intended to seal..." would be considered an inspection failure.

In accordance with 40 C.F.R. §§60.13 and 63.8(f), EPA approves Colonial's AMP request for the IFR storage tanks listed in the AMP request. [Enclosed]. Specifically, EPA approves Colonial's request that includes the following requirements:

### Scope of Request

- This approval is limited to the IFR storage tanks listed in the AMP request which only includes IFR storage tanks that "... are full contact, aluminum honeycomb panel constructed decks with mechanical shoe primary and secondary seals in tanks with geodesic dome roofs ..." that are "... equipped with skylights for enhanced natural lighting for topside in-service deck inspections." (See Enclosed.) For the specified IFR storage tanks, Colonial has confirmed that it has "... visual access to all deck components."
- Colonial will implement its top-side in-service inspection methodology to inspect the IFR storage tanks in the AMP request to meet the NSPS Subpart Kb internal inspection required at intervals no greater than 10 years. [See 40 C.F.R. §§60.113b(a)(2) and (a)(4).]
- Each time an IFR storage tank is emptied and degassed for any reason, Colonial will implement a full top-side and bottom-side out-of-service inspection to identify failures in the deck and seal system.

### Inspection and Repair Methodology

- Colonial will identify and address any gaps of more than 1/8 inch between any deck fitting gasket, seal, or wiper and any surface that it is intended to seal when implementing the top-side in-service internal inspection.
- Colonial will comply with the repair requirements of 40 C.F.R. §60.113b(a)(2), which require repair of the IFR storage tank components or removal of the IFR storage tank from service within 45 days. Consistent with 40 C.F.R. §60.115b(a)(3), if a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested.

### **Recordkeeping and Reporting Requirements**

• Colonial will continue to meet all of the NSPS Subpart Kb recordkeeping and reporting requirements, except that records will be kept for at least five years consistent with the GD MACT and GD GACT rules.

Our office has coordinated this response with the Air Enforcement Division in OECA, the Office of Air and Radiation (OAR), the Office of General Counsel (OGC), and the EPA Regional Offices involved in the requests, including Regions 2, 3, 4, 5, and 6.

If you have any questions regarding this response, please contact Maria Malave of my staff at (202) 564-7027.

Sincerely,

Edward J. Messiria, Director Monitoring, Assistance, and Media Programs Division Office of Compliance

Enclosure: List of Colonial's Facilities and IFR Storage Tanks in the AMP Request

## ENCLOSURE

### LIST OF COLONIAL'S FACILITIES AND IFR STORAGE TANKS IN THE AMP REQUEST

EPA Region	State	State Facility Name Physical Address		City	Tanks ID	Program
6	LA	Bengal	1476 Hwy 61	Jackson	123, 126	GD MACT
6	LA	Baton Rouge	1476 Hwy 61	Jackson	132	GD MACT
4	MS	Collins	35 Pump Station Road	Collins	2066, 2083	GD GACT
4	AL	Peiham	2999 Hwy. 52 East @ Exit 242 off I-65	Pelham	210, 211, 213	GD GACT
4	SC	Belton	1916 Camelot Forest	Belton	511, 513, 514, 530, 531, 534, 536, 537,	GD GACT
4	SC	Spartanburg	180 Keitner Road	Spartanburg	610, 611, 613, 615, 616, 630, 632, 635, 636	GD GACT
4	NC	Charlotte	7524 Kenstead Circle	Charlotte	710, 712, 713, 715, 716, 717, 730, 731, 732, 733, 735, 737	GD GACT
3	MD	Dorsey	929 Hoods Mill Road	Woodbine	1010, 1012, 1013, 1014, 1016, 1031, 1032, 1033, 1034	GD GACT
3	MD	Dorsey	929 Hoods Mill Road	Woodbine	1040, 1041	GD GACT & NSPS Kb
3	MD	Aberdeen	806 West Jarrettsville Road	Forest Hill	1120	GD GACT
2	נא	Woodbury	696 Mantua Grove Road	Woodbury	1210, 1211, 1214, 1233	GD GACT
2	IJ	Linden	400 Blair Road	Woodbridge	1412, 1413, 1414, 1431, 1432, 1433, 1491, 1492	GD GACT

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