# STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

# **PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

# THIS CERTIFIES THAT

Citgo Petroleum Corporation, Vicksburg Terminal
1585 Haining Road
Vicksburg, Mississippi
Warren 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krustal Kudol	ph
AUTHORIZED SIGNA	TURE
MISSISSIPPI DEPARTMENT OF ENVIR	ONMENTAL QUALITY

Issued: <u>April 16, 2020</u> Permit No.: 2780-00063

Effective Date: As specified herein.

Expires: March 31, 2025

**Page 2 of 27** 

**Air SMOP Permit No.: 2780-00063** 

#### Section 1.

#### A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. 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 unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

**Page 3 of 27** 

**Air SMOP Permit No.: 2780-00063** 

- a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

(Ref.: Miss. Code Ann. 49-17-21)

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

10. 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. 2.1.D(7).)

- 11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any 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 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:

**Page 4 of 27** 

Air SMOP Permit No.: 2780-00063

- (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 Part 51, Subpart I, or 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 Part 51, Subpart I, or 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 Part 51, 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).)

### B. GENERAL OPERATIONAL CONDITIONS

1. 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 Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - a. Upsets

(1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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 source 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

Page 6 of 27

Air SMOP Permit No.: 2780-00063

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.)

- 5. Compliance Testing: Regarding compliance testing:
  - a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
  - b. Compliance testing will be performed at the expense of the permittee.
  - c. Each emission sampling and analysis report shall include but not be limited to the following:
    - (1) Detailed description of testing procedures;
    - (2) Sample calculation(s);
    - (3) Results; and
    - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

# C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

## (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. 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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. 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. 2.2.B(15)(b).)

- 4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

# (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

### (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

Page 8 of 27 Air SMOP Permit No.: 2780-00063

# **SECTION 2 EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-000	Bulk Fuel Terminal
AA-002	1,176,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 2), built 1994
AA-003	840,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 3), built 1994
AA-004	630,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 4), built 1961
AA-005	1,266,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 5), built 1985
AA-006	1,266,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 6), built 1985
AA-007	1,266,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 7), built 1986
AA-008	1,266,000 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref. Tank 8), built 1992
AA-009	1,266,000 gallon Gasoline or Diesel Internal Floating Roof Storage Tank (Ref. Tank 9), built 1996
AA-012	10,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-1)
AA-013	8,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-2)
AA-014	4,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-3)
AA-015	2,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-4)
AA-016	1,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-5)
AA-017	40,700 gallon Gasoline or Distillate Fuel Oil Internal Floating Roof Storage Tank (Ref.W/T-1), built 1991
AA-018	Loading Rank with Three Loading Bays controlled by Vapor Combustion Unit
AA-020	2,000 gallon Additive Fixed Roof Storage Tank (Ref. Tank A-6)
AA-021	1,000 gallon Red Dye Fixed Roof Storage Tank (Ref. Tank A-7)
AA-022	30,000 gallon Gasoline and Denatured Ethanol Fixed Roof Storage Tank (Ref. Tank 10), built 2010
AA-023	30,000 gallon Gasoline and Denatured Ethanol Fixed Roof Storage Tank (Ref. Tank 11), built 2010
AA-024	30,000 gallon Gasoline and Denatured Ethanol Fixed Roof Storage Tank (Ref. Tank 12), Upon Construction
FUG-001	Equipment in Gasoline Service Leaks

# SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000 (Facility- wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	Throughput	Throughput limitations (Title V avoidance) ≤ 200,000,000 gallons gasoline (12 months rolling) ≤ 90,000,000 gallons distillate fuel oil (12 months rolling) ≤ 30,000,000 gallons denatured ethanol (12 months rolling)
	11 Miss. Admin. Code Pt. 2, R.1.3.A(1) and (2).	3.2	Opacity	Opacity ≤ 40 %
	11 Miss. Admin. Code Pt. 2, R.1.3.B.	3.3		
	11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(b).	3.4	PM	$E = 0.8808 * I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5		Operate control equipment as efficiently as possible.
	National Emissions Standards for Hazardous Air Pollutants for Source Category (NESHAP), 40 CFR 63 Subpart BBBBBB - Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	3.6	Applicability	NESHAP Applicability
AA-002 AA-003 AA-005 AA-006 AA-007 AA-008 AA-009	New Source Performance Standards (NSPS) 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984	3.7	VOC	NSPS applicability
711 017	40 CFR 60.112b(a)(1), Subpart Kb	3.8	VOC	Design requirements
AA-004	40 CFR 63.11087(a) and Table 1 - 2(b), Subpart BBBBBB	3.9	НАР	Design requirements
AA-018	New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart XX –Standards of Performance for Bulk Gasoline Terminals	3.10	Applicability	NSPS Applicability
	40 CFR 60.502(b), Subpart XX 40 CFR 63.11081(i), Subpart BBBBBB	3.11	VOC	$TOC \le 35$ mg $TOC/L$ gasoline loaded,

	40 CFR 60.502(a) and (d), Subpart XX 40 CFR 63.11088(a), 40 CFR 63 Subpart BBBBBB, Table 2	3.12	VOC/HAP	Design and operational requirements
	40 CFR 60.502(h), Subpart XX	3.13	VOC	Design and operational requirements
	40 CFR 60.502(i), Subpart XX	3.14	VOC	Design requirements
	40 CFR 63.11092(b), Subpart BBBBBB	3.15	НАР	CMS requirements

- 3.1 For Emission Point AA-000, the permittee shall limit facility-wide maximum throughputs to no more than:
  - a. 200,000,000 gallons of gasoline in any rolling 12-month period
  - b. 90,000,000 gallons of distillate fuel in any rolling 12-month period
  - c. 30,000,000 gallons of denatured ethanol in any rolling 12-month period

(Ref.: 11 Miss. Admin Code Pt. 2, R. 2.2.B(10).)

- 3.2 For Emission Point AA-000, 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. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A(1) and (2).)
- 3.3 For Emission Point AA-000, 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 Condition 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.4 For Emission Point AA-000, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 million BTU per hour per heat input shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

3.5 For Emission Point AA-000, the permittee shall operate and maintain equipment to ensure maximum reduction of air contaminants.

(Ref.: 11 Miss. Admin Code Pt. 2, R. 2.2.B(10).)

3.6 For Emission Point AA-000, the permittee is subject to and shall comply with the applicable requirements of National Emissions Standards for Hazardous Air Pollutants for Source Category (NESHAP), 40 CFR 63, Subpart A - General Provisions and Subpart BBBBB - Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. For the purposes of this subpart, the facility is considered a bulk gasoline terminal.

(Ref.: 40 CFR 63.11081(a)(1), Subpart BBBBBB)

3.7 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, depending on the stored liquid's vapor pressure, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards (NSPS) 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 and 40 CFR 60, Subpart A - General Provisions.

Note: Gasoline storage tanks subject to, and in compliance with the control requirements of 40 CFR 60, Subpart Kb satisfies the requirements for 40 CFR 63, Subpart BBBBBB as stated in 40 CFR 63.11087(f).

(Ref.: 40 CFR 60.110b(a), Subpart Kb)

- 3.8 For Emission Point AA- AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
  - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
  - b. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
    - A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
    - 2. Two seals mounted above the other so that each forms a continuous closure that completely covers the space between the wall of the storage

- vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
- 3. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and the stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting
- g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover

(Ref.: 40 CFR 60.112b(a)(1), Subpart Kb)

- 3.9 For Emission Point AA-004, the permittee shall equip the internal floating roof gasoline storage tank as required in Condition 3.8 except for the secondary seal requirements in the Condition 3.8 (b)(2) and (d)-(i).
  - (Ref.: 40 CFR 63.11087(a) and Table 1, Subpart BBBBBB)
- 3.10 For Emission Point AA-018, the permittee is subject to and shall comply with the applicable requirements of the 40 CFR Part 60, Subpart XX Standards of Performance for Bulk Gasoline Terminals, and the General Provisions in 40 CFR Part 60, Subpart A. (Ref.: 40 CFR 60, Subpart XX)

3.11 For Emission Point AA-018, the permittee shall be limited to 35 mg Total Organic Compounds (TOC) per liter of gasoline loaded as determined by EPA Reference Methods 25A or 25B, Appendix A and the test methods and procedures specified in 40 CFR 60.503 and 63.11092(a)(i).

(Ref.: 40 CFR 60.502(b), Subpart XX and 40 CFR 63.11081(i), Subpart BBBBBB)

- 3.12 For Emission Point AA-018, the permittee shall:
  - a. equip each loading rack with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading and;
  - b. design and operated the vapor collection system to prevent any TOC vapors collected at one loading rack from passing to another loading rack and;
  - c. limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR 60.502(e) through (j);
  - d. ensure the annual vapor tightness certification test is conducted according to the test methods specified in 40 CFR 63.11092(f).

Note: The permittee is limited to 35 mg TOC/liter of gasoline loaded into gasoline cargo tanks from the loading rack (Condition 3.11 of this permit). The loading rack is also subject to 80 mg TOC per liter of gasoline loaded (Table 2 of 40 CFR 63, Subpart BBBBBB). By demonstrating compliance with the more stringent NSPS Subpart XX limit of 35 mg TOC/liter of gasoline loaded into gasoline cargo tanks from the loading rack the permittee will also demonstrate compliance with the NESHAP Subpart BBBBBB limit.

(Ref.: 40 CFR 60.502(a) and (d), Subpart XX and 40 CFR 63.11088(a), 40 CFR 63. Subpart BBBBBB, Table 2)

- 3.13 For Emission Point AA-018, the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measure by the procedures specified in 40 CFR 60.503(d).
  - (Ref.: 40 CFR 60.502(h), Subpart XX)
- 3.14 For Emission Point AA-018, no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).
  - (Ref.: 40 CFR 60.502(i), Subpart XX)
- 3.15 For Emission Point AA-018, the permittee shall install, calibrate, certify, operate, and maintain according to the manufacture's specifications, a continuous monitoring system while gasoline vapors are displaced to the thermal oxidizer system as specified in Conditions 5.20 and 5.21.

(Ref.: 40 CFR 63.11092(b), Subpart BBBBBB)

# SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
AA-000 (Facility- Wide)	40 CFR 63.11085(a), Subpart BBBBBB	4.1	НАР	Shall operate and maintain any affected source in a manner consistent with safety and good air pollution control practices
AA-018	40 CFR60.502(e)(1)-(5), Subpart XX and Item 1 of Table 2, Subpart BBBBBB	4.2	VOC	Loading procedures
	40 CFR 60.502(f), Subpart XX	4.3		Compatible collection equipment requirement
	40 CFR 60.502(g), Subpart XX	4.4		Ensure vapor collection connection
	40 CFR 63.11092(d), Subpart BBBBBB	4.5	НАР	Operational requirement

- 4.1 For Emission Point AA-000, the permittee shall, at all times, operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are be used will be based on information available to the MDEQ, 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.: 40 CFR Part 63.11085(a), Subpart BBBBBB)
- 4.2 For Emission Point AA-018, loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
  - a. The permittee shall obtain the vapor tightness documentation meeting the requirements in Condition 5.18 for each gasoline tank truck which is to be loaded.
  - b. The permittee shall document the tank identification number of each gasoline tank truck loaded per loading event
  - c. The permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded unless either (i) or (ii) below is maintained. If either the quarterly or semiannual cross-check (c)(i) or (ii) of this condition reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.
    - 1. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

- 2. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
- d. The permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check required in (c) above
- e. The permittee shall take steps assuring that the non vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

(Ref.: 40 CFR 60.502(e)(1)-(5), Subpart XX and Item 1 of Table 2, Subpart BBBBBB)

- 4.3 For Emission Point AA-018, the permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

  (Ref.: 40 CFR 60.502(f), Subpart XX)
- 4.4 For Emission Point AA-018, the permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

  (Ref.: 40 CFR 60.502(g), Subpart XX)
- 4.5 For Emission Point AA-018, the permittee shall operate the vapor processing system in a manner not to exceed or go below, as appropriate, the operating parameter required in Condition 5.20. Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in Condition 3.13. However, malfunctions discovered by the monitoring and inspections required in Condition 5.20 shall not constitute a violation of the emissions standard if corrective actions described in the monitoring and inspection plan are followed. Also, the permittee shall ensure the steps listed in 40 CFR 63.11092(d)(4)(i-v) are followed.

(Ref.: 40 CFR 63.11092(d), Subpart BBBBBB)

# SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
wide)	11 Miss. Admin. Code Pt. 2, R.2.2.B(11).	5.2	Recordkeeping	Monthly emissions emitted and throughput records
	40 CFR 63.11094(g), Subpart BBBBBB	5.3	Recordkeeping	Maintain records of malfunctions and mitigating actions
AA-002 AA-003	40 CFR 60.113b(a)(1), Subpart Kb	5.4	VOC	Inspection requirement
AA-005 AA-006	40 CFR 60.113b(a)(2), Subpart Kb	5.5		Inspection requirement
AA-007 AA-008	40 CFR 60.113b(a)(3), Subpart Kb	5.6		Inspection requirement
AA-009 AA-017	40 CFR 60.113b(a)(4), Subpart Kb	5.7		Inspection requirement
	40 CFR 60.115b(a), Subpart Kb	5.8		Recordkeeping and reporting requirement
	40 CFR 60.116b(a), Subpart Kb	5.9		Recordkeeping requirement
	40 CFR 60.116b(b), Subpart Kb	5.10		Recordkeeping requirement
	11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11). 40 CFR 60.116b(c), Subpart Kb	5.11		Recordkeeping requirement
AA-004	40 CFR 63.11087(c) and 40 CFR 63.11092(e)(1), Subpart BBBBBB	5.12	НАР	Inspection requirement
	11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11).	5.13	НАР	Recordkeeping requirement
	40 CFR 63.11094(a), Subpart BBBBBB			
AA-018	40 CFR 60.502(j), Subpart XX	5.14	TOC	Monthly inspections
	40 CFR 60.505(c), Subpart XX	5.15	TOC	Recordkeeping requirement
	40 CFR 63.11092(b), Subpart BBBBBB	5.16	НАР	CEMS operation requirement
	11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11). 40 CFR 60.503, Subpart XX 40 CFR 63.11092, Subpart BBBBBB	5.17	ТОС/НАР	Stack test requirement

	40 CFR 60.505(a-b), 40 CFR 60.505(e), Subpart XX 40 CFR 63.11088(f), 40 CFR 63.11094(b-c), Subpart BBBBBB	5.18	ТОС/НАР	Recordkeeping requirement
	40 CFR 60.505(d), Subpart XX	5.19	TOC	Recordkeeping requirement
	40 CFR 63.11088(d) and 40 CFR 63.11092(b)(1)(iii), Subpart BBBBBB	5.20	НАР	Monitoring requirement
	40 CFR 63.11092(b)(3)-(4) and (c), Subpart BBBBBB	5.21	НАР	Monitoring requirement
FUG-001	40 CFR 63.11089(a)-(d), Subpart BBBBBB	5.22	НАР	Inspection requirement
	40 CFR 63.11089(g) and 40 CFR 63.11094(d), Subpart BBBBBB	5.23	НАР	Recordkeeping requirement
	40 CFR 63.11089(g) and 40 CFR 63.11094(e), Subpart BBBBBB	5.24	НАР	Recordkeeping requirement

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports 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 or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For Emission Point AA-000, in order to demonstrate compliance with the throughput limitations specified in Section 3, the permittee shall maintain the monthly throughputs of each product (gasoline, additive, distillate fuel oil, and off-spec).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.3 For Emission Point AA-000, 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, and
  - b. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 4.1.

(Ref.: 40 CFR 63.11094(g), Subpart BBBBBB)

5.4 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal,

or the seal fabric or defects in the internal floating roof, or both, the owner of operator shall repair the items before filling the storage vessel.

(Ref.: 40 CFR 60.113b(a)(1), Subpart Kb)

5.5 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, if equipped with a mechanical shoe primary seal, the permittee shall 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. If a failure that is detected during inspections required by this condition cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from MDEQ in the inspection report required by Condition 6.9. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

(Ref.: 40 CFR 60.113b(a)(2), Subpart Kb)

- 5.6 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, if the vessels are equipped with a (vapor mounted) double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
  - a. Visually inspect the vessel as specified in Condition 5.7 at least every 5 years or
  - b. Visually inspect the vessel as specified in Condition 5.5.

(Ref.: 40 CFR 60.113b(a)(3), Subpart Kb)

5.7 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall 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 condition occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Condition 5.5 and at intervals no greater than 5 years in the case of vessels specified in Condition 5.18.

(Ref.: 40 CFR 60.113b(a)(4), Subpart Kb)

5.8 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall keep a record of each inspection

performed as required by Conditions 5.5, 5.6 and 5.7. 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.: 40 CFR 60.115b(a), Subpart Kb)

5.9 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall keep copies of all records required by Subpart Kb except for the records required in Condition 5.10 for at least two years.

(Ref.: 40 CFR 60.115 and 40 CFR 60.116b(a), Subpart Kb)

5.10 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, 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 storage vessel.

(Ref.: 40 CFR 60.116b(b), Subpart Kb)

- 5.11 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall maintain a record of the liquid stored, the period of storage, the maximum true vapor pressure of the liquid during the respective storage period and applicability to 40 CFR 60, Subpart Kb. The permittee shall also maintain a record of each roof landing along with the landing's duration and reason for the landing. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11). and 40 CFR 60.116b(c), Subpart Kb)
- 5.12 For Emission Point AA-004, the permittee shall perform inspections of the floating roof system according to the requirements in Conditions 5.4 through 5.7, as required.

  (Ref.: 40 CFR 63.11087(c) and 40 CFR 63.11092(e)(1), Subpart BBBBBB)
- 5.13 For Emission Point AA-004, the permittee shall keep records of the inspections required in Condition 5.12 as specified in Condition 5.8 except records shall be kept for at least 5 years. The permittee shall also keep records as required in Condition 5.11 except for the applicability to 40 CFR 60, Subpart Kb.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11). and 40 CFR 63.11094(a), Subpart BBBBBB)

5.14 For Emission Point AA-018, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected each calendar month during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected.

(Ref.: 40 CFR 60.502(i), Subpart XX)

- 5.15 For Emission Point AA-018, a record of each monthly leak inspection shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:
  - a. Date of inspection.
  - b. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak)
  - c. Leak determination method.
  - d. Corrective action (date each leak repaired; reasons for any repair interval in excess of fifteen (15) days).
  - e. Inspector name and signature.

(Ref.: 40 CFR 60.505(c), Subpart XX)

5.16 For Emission Point AA-018, the permittee shall calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems, as specified in Conditions 5.20 and 5.21. For each performance test conducted under Condition 5.17, the owner or operator shall determine a monitored operating parameter value for the vapor processing system as specified in 40 CFR 63.11092(b)(iii). During the performance test required in Condition 5.17, continuously record the operating parameter as specified in Condition 5.20.

(Ref.: 40 CFR 63.11092(b), Subpart BBBBBB)

5.17 For Emission Point AA-018, the permittee shall demonstrate compliance with the TOC emission limitations on the vapor combustion unit by stack testing in accordance with EPA Reference Method 25A or 25B and the test methods and procedures specified in 40 CFR 60.503 and 40 CFR 63.11092(a)(i). A stack test shall be conducted once every five years not to exceed 61 months from the previous test. The permittee shall demonstrate compliance with a stack test completed no later than twelve (12) months after permit issuance.

The test shall be six hours in duration during which at least 300,000 liters of gasoline must be loaded. If this is not possible, the test may be continued the same day until 300,000 liter of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000 liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the test so that an observer may be afforded the opportunity to witness the test.

(Ref: 11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11)., 40 CFR 60.503, Subpart XX and 40 CFR 63.11092, Subpart BBBBBB)

- 5.18 For Emission Point AA-018, the permittee shall keep records of the test results for each gasoline cargo tank loading at the facility according to the following:
  - a. Records of the annual certification testing performed under 40 CFR 60.505(b) and 63.11092(f)(1),
  - b. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation of each test shall include, as a minimum, the information in (1) through (8) below:
    - 1. Name of test (e.g. Annual Certification Test- Method 27)
    - 2. Cargo tank owner's name and address
    - 3. Cargo tank identification number
    - 4. Test location and date
    - 5. Tester name and signature
    - 6. Witnessing inspector, if any: Name, signature, and affiliation.
    - 7. Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing
    - 8. Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.
  - c. As an alternative to keeping records of each gasoline cargo tank test at the terminal, as required in (a) and (b) above, the permittee may comply with either of the following:
    - 1. Keep an instantly available electronic copy of each record available at the terminal. The copy of each record must be an exact duplicate image of the original paper record with certifying signatures. MDEQ must be notified in writing that the terminal is in compliance with this alternative; or
    - 2. For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection during the course of a site visit, or within a mutually agreeable time frame.

(Ref.: 40 CFR 60.505(a-b), 40 CFR 60.505(e), Subpart XX and 40 CFR 63.11088(f), 40 CFR 63.11094(b-c), Subpart BBBBBB)

- 5.19 For Emission Point AA-018, the permittee shall keep documentation of all notifications required by Condition 4.2(d) on file at the terminal for at least two (2) years.

  (Ref.: 40 CFR 60.505(d), Subpart XX)
- 5.20 For Emission Point AA-018, the permittee shall as an alternative to paragraph (b)(1)(iii)(A) of 40 CFR 63.11092, the permittee shall meet the requirements below:
  - a. The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The

- heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.
- b. Develop, submit to the Administrator, and maintain onsite a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements below:
  - 1. The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
  - 2. The owner or operator shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.
  - 3. The owner or operator shall perform semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.
  - 4. The monitoring plan shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under paragraphs (2) and (3) above, describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction.
  - 5. The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
- c. The permittee shall document the reasons for a change in the operating parameter value being monitored (i.e. the presence of a pilot flame) when there is a change from what was established in a previous performance test.

(Ref.: 40 CFR 63.11088(d) and 63.11092(b)(1)(iii) and (c), Subpart BBBBBB)

5.21 For Emission Point AA-018, the facility shall reevaluate the operating parameter value and rationale required in 40 CFR 63.11092(b)(3)-(4) with each performance test required in Condition 5.17. The permittee shall document the reasons for any change in the operating parameter value since the previous performance test.

(Ref.: 40 CFR 63.11092(b)(3)-(4) and (c), Subpart BBBBBB)

- 5.22 For Emission Point FUG-001, the permittee is subject to and shall comply with the following equipment leak inspection requirements:
  - a. Perform a monthly leak inspection of all equipment in gasoline service, as defined in 40 CFR 63.11100. For this inspection detection methods incorporating sight, sound and smell are acceptable.
  - b. A log book shall be used and shall be signed by the permittee at the completion of each inspection. Each detection of a liquid or vapor leak shall be recorded in the log book. 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.
  - c. When a leak is detected, an initial attempt a repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within fifteen (15) calendar days after detection of each leak.
  - d. 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 in Condition 6.6, the reason(s) why the repair was not feasible and the date each repair was completed.

(Ref.: 40 CFR 63.11089(a)-(d), Subpart BBBBBB)

5.23 For Emission Point FUG-001, the permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service.

(Ref.: 40 CFR 63.11089(g), 40 CFR 63.11094(d), Subpart BBBBBB)

- 5.24 For Emission Point FUG-001, 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.
  - g. The date of successful repair of the leak.

(Ref.: 40 CFR 63.11089(g), 40 CFR 63.11094(e), Subpart BBBBBB)

# SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility- Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR Part 63, Subpart BBBBBB	6.2	Submit certified semi-annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Annual roof landing report
	40 CFR 63.11087(e), 40 CFR 63.11088(f), 40 CFR 63.11095(a) & (d), Subpart BBBBBB	6.5	Semi-annual report requirement
	40 CFR 63.11087(e), 40 CFR 63.11088(f), and 40 CFR 63.11095(b), Subpart BBBBBB	6.6	Semi-annual report requirement
AA-018	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit stack test results within 60 days
AA-002 AA-003	40 CFR 60.113b(a)(5), Subpart Kb	6.8	Reporting requirement
AA-005 AA-006 AA-007 AA-008 AA-009 AA-017	40 CFR 60.115b(a)(3-4), Subpart Kb	6.9	Reporting requirement

- 6.1 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 five (5) working days of the time the deviation began.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 Except as otherwise specified herein, the permittee shall submit a certified semi-annual synthetic minor monitoring report postmarked no later than 31st of January and 31st of July for the preceding six month period. This report shall address any required monitoring specified in the permit. The report shall include the product throughput records required in Conditions 5.1 and 5.2 and a summary of the inspections conducted in Conditions 5.4 through 5.7 and 5.12. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is

Page 25 of 27

**Air SMOP Permit No.: 2780-00063** 

required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR Part 63 Subpart BBBBBB)

6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating 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. 2.2.B(11).)

6.4 For Emission Point AA-000, the permittee shall submit an annual report of the number of roof landings conducted throughout the previous twelve (12) month period for each tank. This report shall be submitted by January 31st of each year. The report shall include the duration (in hours) of each landing and the reason for the roof landing (i.e., cleaning, degassing, product change out, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.5 For Emission Points AA-000, the permittee shall submit the following information in accordance with Condition 6.2:
  - a. For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.
  - b. For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection
  - c. 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; a description of actions taken during the malfunction to minimize emissions in accordance with 40 CFR 63.11085(a); and actions taken to correct the malfunction.

(Ref.: 40 CFR 63.11087(e), 40 CFR 63.11088(f), 40 CFR 63.11095(a) and (d), Subpart BBBBBB)

- 6.6 For Emission Point AA-000, the permittee shall submit an excess emissions report along with the semiannual compliance report required in Condition 6.5. Excess emissions events and the information to be included in the excess emissions report are specified in paragraphs (a) through (e) below:
  - a. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined in accordance with Condition 5.20. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.
  - b. Each instance in which malfunctions discovered during the monitoring and inspections required by Condition 5.20(b) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The

- report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.
- c. For 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:
  - 1. The date on which the leak was detected;
  - 2. The date of each attempt to repair the leak;
  - 3. The reasons for the delay of repair;
  - 4. The date of successful repair
- d. Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.
- e. Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with Condition 5.18.

(Ref.: 40 CFR 63.11087(e), 40 CFR 63.11088(f), and 40 CFR 63.11095(a)(1) & (b), Subpart BBBBBB)

6.7 For Emission Point AA-018, the permittee shall submit results of the stack test required in Condition 5.17 to MDEQ within 60 days of the test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.8 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017, the permittee shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Conditions 5.4 and 5.7 to afford MDEQ the opportunity to have an observer present. If the inspection required by Condition 5.7 is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify MDEQ 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 MDEQ at least 7 days prior to the refilling.

(Ref.: 40 CFR 60.113b(a)(5), Subpart Kb)

- 6.9 For Emission Points AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-017,
  - a. if any of the conditions described in Condition 5.5 are detected during the annual visual inspection required in Condition 5.5, a report shall be furnished to MDEQ within 30 days of the inspection. Each report shall identify the storage vessel, the

Page 27 of 27

**Air SMOP Permit No.: 2780-00063** 

- nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- b. After each inspection required by Condition 5.6 that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to MDEQ within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 61.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made.

(Ref.: 40 CFR 60.115b(a)(3-4), Subpart Kb)