

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **January XXX, 2009**

**Region:** Wilmington Regional Office  
**County:** New Hanover  
**NC Facility ID:** 6500261  
**Inspector's Name:** Lynette Bryan  
**Date of Last Inspection:** 09/21/2007  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> CTI of NC Inc  <b>Facility Address:</b> CTI of NC Inc 1002 South Front Street Wilmington, NC 28401  <b>SIC:</b> 4226 / Special Warehousing & Storage <b>NAICS:</b> 49311 / General Warehousing and Storage  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 6500261.07B <b>Date Received:</b> 07/26/2007 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 05870/T14 <b>Existing Permit Issue Date:</b> 09/30/2008 <b>Existing Permit Expiration Date:</b> 08/31/2013		
Bob Welch Terminal Manager (910) 251-1020 1002 South Front Street Wilmington NC, 28401	William Baker, Jr. Vice President (912) 443-6553 P O Box 576 Savannah GA, 31402	James Baker EHS Manager (912) 443-6553 P.O. Box 576 Savannah GA, 31402			
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>January XXX, 2009</b>			<b>Comments / Recommendations:</b> Issue 05870/T15 <b>Permit Issue Date:</b> <b>January XXX, 2009</b> <b>Permit Expiration Date:</b> <b>December 31, 2013</b>		

**I. Purpose of Application**

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05870T14**) was issued on **September 30, 2008**, and is currently scheduled to expire on **August 31, 2013**. The renewal application was received on **July 26, 2007** or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

In addition to renewal of the existing permit, the Permittee has proposed modifications to current State-enforceable toxics permit language to change recordkeeping requirements for the loading and filling of VOCs and HAPs. Also as a clarification, the Permittee has proposed modifications to both the MACT and PSD Avoidance conditions that require that HAP emissions from the landing of storage tank floating roofs, degassing of any storage tank, and from other sources of emissions associated with the storage tanks and loading racks be included in the monthly VOC and HAP calculations.

## II. Facility Description

CTI of North Carolina operates a bulk liquid distribution facility. The facility stores and distributes bulk products in liquid and solid form, such as, but not limited to, diesel fuel, fuel oil, chlorinated solvents, and inorganic chemicals such as sulfuric acid. The facility operates 24 hours a day, 365 days a year.

## III. History/Background/Application Chronology

**December 12, 2003** – Permit **05870T11** issued following reaching agreement on issues that led to a Petition for Contested Case by the Permittee for the issuance of **05870T09**.

**October 3, 2005** - Permit **05870T12** issued as a significant modification for the modification an existing vapor combustion system (**ID No. ZTOF-01**) in order to abate HAP emissions from the truck loading rack No. 1 (**ID No. TRL1**) and the rail loading rack (**ID No. RLR**); to request federally-enforceable conditions that restrict facility-wide potential emissions of hazardous air pollutants to below the major source thresholds of 10 tons per year of any individual HAP and 25 tons per year of any combination of HAPs; to request a facility-wide volatile organic compound emission limitation of 249 tons per year; to request that clarification language be inserted for NSPS Subpart Kb compliance regarding emptying and refilling of storage tanks; and to make additional administrative changes.

**July 26, 2007** – Permit application **6500261.07B** received and deemed complete for processing.

**August 17, 2007** – Permit **05870T13** issued as a significant modification for the approval to use an existing barge loading rack (**ID No. MLR**) to transfer methanol and to construct a packed bed scrubber (**ID No. SC01**) that will be used to control methanol emissions from that loading rack.

**September 11, 2008** – DRAFT permit sent to Permittee, WIRO, and Supervisor for comment prior to 30-day public notice and 45-day EPA review periods. The Permittee replied with a no comment email on **September 19, 2008**. WIRO comments were received via phone call on **October 1, 2008**.

**September 30, 2008** – Permit **05870T14** issued as a minor modification for the addition of natural gas as an allowed fuel for combustion in the facility's boilers.

**Date, 2008** – DRAFT permit sent to public notice and EPA review prior to issuance.

## IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Cover	-	-amended all dates and permit revision numbers
TOC	-	-added reference to Section 2.3 -removed all references to Part II
All	Header	-amended permit revision number
3-4	Equipment Table	-grouped like sources -amended equipment descriptions as necessary to match ESM
5	2.1 A.1.b 2.1 A.2.b	-corrected testing cross reference -corrected testing cross reference
6	2.1 A.3.b	-corrected testing cross reference

Page	Section	Description of Change
7	2.1 B.2.b 2.1 B.2.c	-removed December 1, 2002 date for painting of tanks as date has already passed -removed December 1, 2002 date for equipping tanks with self-supporting roofs as date has already passed
8	2.1 B.3	-added applicability statement to avoidance condition (2D .0933)
9	2.1 C (table)	-added ID numbers where necessary for clarification of applicability -added NSPS Subpart designation
10	2.1 C.1.a	-updated shell language (removed old paragraph a and renumbered subsequent paragraphs)
11	2.1 C.1.d 2.1 C.1.e	-corrected cross reference due to renumbering of section -corrected cross reference due to renumbering of section
12	2.1 C.1.j 2.1 C.1.k 2.1 C.1.l 2.1 C.2.a	-corrected cross reference due to renumbering of section -corrected cross reference due to renumbering of section -corrected cross reference due to renumbering of section -added ID numbers
13	2.1 C.2.c 2.1 D (table)	-added ID numbers -added ID numbers where necessary for clarification of applicability
14	2.1 D.1.a 2.1 D.1.d 2.1 D.2.a.v	-added ID numbers -added ID numbers -corrected testing cross reference
15	2.1 D.2.b.i 2.1 D.2.b.ii 2.1 D.3.a	-added ID numbers -added ID numbers -added ID numbers
16-17	2.1 D.4	-added section for CAM
17	2.2 A.1	-moved former paragraph h language to beginning of permit condition
19	2.2 A.1.f	-added ID numbers
20	2.2 A.1.g 2.2 A.1.h  2.2 A.3.a	-added ID numbers -modified recordkeeping language to reflect alternative demonstration per Permittee request -added "avoided" MAVT Subpart listings
21	2.2 A.3.e 2.2 A.3.f	-corrected testing cross reference -added testing requirements per WIRO comments -corrected testing cross reference
22	2.2 A.3.i.i	-modified definition of "control efficiency" to add language specifying efficiency with control device operating levels
23	2.2 A.3.i.iii	-added clarification for calculating monthly HAP emissions during floating roof landings per Permittee request
24-25	2.2 A.4.e	-corrected testing cross reference -added testing requirements per WIRO comments
25	2.2 A.4.f	-corrected testing cross reference
26	2.2 A.4.i.i  2.2 A.4.i.iii	-modified definition of "control efficiency" to add language specifying efficiency with control device operating levels -added clarification for calculating monthly HAP emissions during floating roof landings per Permittee request
28	2.3	-added Section for non-applicable requirements (CAM)

*It should be noted that each source (permitted and insignificant) were checked in ESM to match renewed permit.*

## V. Regulatory Review

The Permittee is subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers

15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources

15A NCAC 2D .0521, Control of Visible Emissions

15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subparts Kb)

15A NCAC 2D .0925, Petroleum Liquid Storage in Fixed-Roof Tanks (*Note: This regulation only applies to tanks **ID Nos. 114, 115, and 117** if gasoline is stored in the tank and it has been retrofitted with a self-supporting roof*)

15A NCAC 2D .0927, Bulk Gasoline Terminals (*Note: This regulation only applies to tanks **ID Nos. 114, 115, and 117** if gasoline is stored and to tank truck loading rack **ID No. TLR1** when loading gasoline*)

15A NCAC 2D .0932, Gasoline Tank Trucks and Vapor Collection Systems (*Note: This regulation only applies to tank truck loading rack **ID No. TLR1** when loading gasoline*)

15A NCAC 2D .0933, Petroleum Liquid Storage in External Floating Roof Tanks (*Note: This regulation only applies to tanks **ID Nos. 114, 115, and 117** if it has been retrofitted with a self-supporting roof*)

15A NCAC 2D .0948, VOC Emissions from Transfer Operations (*Note: This regulation only applies to the marine loading rack **ID No. MLR**, railcar loading rack **ID No. RLR**, and two tank truck loading racks **ID Nos. TLR1 and TLR2** when loading volatile organic compounds other than gasoline*)

15A NCAC 2D .0949, Storage of Miscellaneous Volatile Organic Compounds

15A NCAC 2D .1100, Control of Toxic Air Pollutants

15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subparts R and EEEE)

15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

15A NCAC 2Q .0317, Avoidance Conditions (MACT and PSD)

A regulatory review for the existing conditions will not be included in this document.

As a result of this permit renewal, a placeholder regulation has been added to the permit for 15A NCAC 2D .0614, Compliance Assurance Monitoring. This regulation applies to the truck loading rack in the event that gasoline is loaded at the facility.

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – Twelve of the facilities storage tanks (**ID Nos. 213 through 220 and 222 through 225**) are each subject to the “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 60, Subpart Kb). The Permittee shall comply with all applicable provisions, including the notifications, testing, monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility currently operates under a MACT Avoidance condition limiting emissions of any single HAP to less than 10 tons per year and any combination of HAPs to less than 25 tons per year in order to avoid applicability of 40 CFR 63, Subparts EEEE – Organic Liquid Distribution; R – Gasoline Distribution; and DDDDD – Combustion MACT (currently vacated). As noted in Lynette Bryan’s September 21, 2007 inspection report,

“the facility has stated that by limiting facility-wide HAP emissions, Subpart R will not be applicable as the facility has never (*prior to the compliance date*) loaded or unloaded petroleum products and can not be considered a “bulk gasoline terminal” as defined by the definition of 40 CFR 63.421. Therefore by going to HAP synthetic minor status, the facility would be able to engage in bulk gasoline terminals activity and not be subject to Subpart R. The Subpart states that bulk gasoline terminals that are located at facilities that are not major for HAPs are not affected sources.”

The permit stipulation requires that testing be completed for collection and destruction efficiencies of both the vapor combustor (**ID No. ZTOF1**) and scrubber (**ID No. SC-01**) for each HAP that may be loaded at the facility before any control efficiency above 90% and 95% efficiencies can be claimed. In addition, monitoring, recordkeeping and reporting is required. This permit renewal does not affect this status.

As part of the permit renewal, the Permittee has requested that a modification in monitoring and recordkeeping requirements be made. Specifically, a requirement that the Permittee include HAP emissions from the landing of storage tank floating roofs, degassing of any storage tanks, and from other sources of emissions associated with the storage tanks and loading racks into the monthly HAP calculations.

In addition to the above approved modifications, a clarification of overall control efficiency (CE) calculation has been added to the renewed permit. CE is now defined as the overall control efficiency of the HAP abatement system for each loading rack (percent/100). It is considered to be:

*“0% if uncontrolled (e.g., control device(s) not operating, once through water rate of the scrubber (ID No. CS01) drops below 5 gallons per minute, or no flame detected in the combustion unit (ID No. ZTOF-01)). Until performance testing is performed per Section 2.2 A.3.e and f above, CE will be considered 92.58% for the vapor combustion unit (ID No. ZTOF-01) and 95% for the packed bed scrubber (ID No. SC01). Once performance testing is completed, the value of the most recent test shall be used.”*

**PSD** – The facility currently operates under a PSD Avoidance condition limiting emissions of facility-wide volatile organic compound emissions to less than 249 tons per year. The permit stipulation requires that testing be completed for collection and destruction efficiencies of both the vapor combustor (**ID No. ZTOF1**) and scrubber (**ID No. SC-01**) for each HAP that may be loaded at the facility before any control efficiency can be claimed; otherwise 90% and 95% efficiencies will be assumed respectively. In addition, monitoring, recordkeeping and reporting is required. This permit renewal does not affect this status.

As part of the permit renewal, the Permittee has requested that a modification in monitoring and recordkeeping requirements be made. Specifically, a requirement that the Permittee include VOC emissions from the landing of storage tank floating roofs, degassing of any storage tanks, and from other sources of emissions associated with the storage tanks and loading racks into the monthly VOC calculations.

In addition to the above approved modifications, a clarification of overall control efficiency (CE) calculation has been added to the renewed permit. CE is now defined as the overall control efficiency of the HAP abatement system for each loading rack (percent/100). It is considered to be:

“0% if uncontrolled (e.g., control device(s) not operating, once through water rate of the scrubber (ID No. CS01) drops below 5 gallons per minute, or no flame detected in the combustion unit (ID No. ZTOF-01)). Until performance testing is performed per Section 2.2 A.3.e and f above, CE will be considered 92.58% for the vapor combustion unit (ID No. ZTOF-01) and 95% for the packed bed scrubber (ID No. SC01). Once performance testing is completed, the value of the most recent test shall be used.”

**112(r)** – The facility is not currently subject to the requirements of this Section. No modification is required as part of the permit process.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table represents the current emission source/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
TLR1	One tank truck loading rack (the submerged-boom loading arm shall be used when loading any TAP listed in Table 1)	ZTOF01	One vapor combustion unit
RLR	One railcar loading rack utilizing a submerged-boom loading arm		
MLR	One marine loading rack with a submerged-boom loading arm	SC01	One packed bed scrubber (5 gallons per minute single pass water injection rate)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)	Control Equipment Installed to Meet Permit Limit?
TLR1	ZTOF01	VOCs – 15A NCAC 2D .0927 VOCs – 15A NCAC 2D .0932 VOCs – 15A NCAC 2D .0948 TAPs – 15A NCAC 2D .1100 Odors – 15A NCAC 2D .1806 HAPs – 15A NCAC 2Q .0317 VOCs – 15A NCAC 2Q .0317	<b>Yes (when loading gasoline only)</b> No, work practice standards No, work practice standards No, not criteria pollutant No, not criteria pollutant <b>Yes (less than 10/25 tpy)*</b> <b>Yes (less than 249 tpy)*</b>
RLR	ZTOF01	VOCs – 15A NCAC 2D .0948 TAPs – 15A NCAC 2D .1100 Odors – 15A NCAC 2D .1806 HAPs – 15A NCAC 2Q .0317 VOCs – 15A NCAC 2Q .0317	No, work practice standards No, not criteria pollutant No, not criteria pollutant <b>Yes (less than 10/25 tpy)*</b> <b>Yes (less than 249 tpy)*</b>

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)	Control Equipment Installed to Meet Permit Limit?
MLR	SC01	VOCs – 15A NCAC 2D .0948 TAPs – 15A NCAC 2D .1100 Odors – 15A NCAC 2D .1806 HAPs – 15A NCAC 2Q .0317 VOCs – 15A NCAC 2Q .0317	No, work practice standards No, not criteria pollutant No, not criteria pollutant <b>Yes (less than 10/25 tpy)*</b> <b>Yes (less than 249 tpy)*</b>

\* Although the Permittee estimates potential pre-control emissions of these pollutants above the CAM applicability thresholds, 15A NCAC 2D .0614(b)(1)(E) exempts control devices from CAM applicability for which the associated emission source is subject to “an emissions cap that is approved under the rules of this Subchapter (2D) and Subchapter 15A NCAC 2Q and incorporated in a permit issued under 15A NCAC 2Q .0500.” In each case, the Avoidance Conditions are emissions caps as defined in the rule.

However, in the case of truck loading rack No. 1, the control equipment is also installed for HAP/VOC control while loading gasoline at the facility per 15A NCAC 2D .0927. Gasoline is currently not being loaded at the facility. The Permittee estimates potential pre-control HAP emissions from this source as follows:

Emission Source ID No.	Control Device ID No.	Pre-Controlled Emissions (tpy)*	CAM Applicable Yes/No?
TLR1	ZTOF01	222.28	<b>Yes</b>

\* Pre controlled emissions calculated for TLR1 is based upon emissions as specified in Attachment II, Table 6 of the April 2005, Title V Application for the avoidance of NESHAP Subparts EEEE and DDDDD. (Copies of these tables will be included in the collection of documents for this renewal).

Therefore, the following placeholder language has been included as Section 2.1 D.4 in the event that gasoline is loaded at the facility:

#### **4. 15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING**

- a. Per 40 CFR 64 and 15A NCAC 2D .0614, the Permittee shall comply with the following.
- b. Background.
  - i. Emission Unit. One tank truck loading rack (ID No. TLR1).
  - ii. Applicable Regulation. 15A NCAC 2D .0927 (when loading gasoline). Gasoline tank truck loading rack emissions shall not exceed 35 milligrams of VOC per liter of gasoline loaded.
  - iii. Control Technology. One vapor combustion unit (ID No. ZTOF01).
- c. Monitoring approach. The key elements of the monitoring approach for volatile organic compounds from the loading of gasoline in this source, including parameters to be monitored, parameter ranges, and performance criteria are presented in the following table. The selected performance indicator is the presence of a pilot flame during loading operations.

<b>Control Device ID No. ZTOF01</b>	<b>Indicator</b>
<p><i>I. Indicator</i></p> <p><i>Measurement Approach</i></p>	<p><i>Presence of pilot light flame.</i></p> <p><i>The presence of a pilot light flame on the flare during loading operations associated with TLR1 will be monitored continuously while loading gasoline using a UV beam detector. Monitoring points are located to provide an accurate detection of the pilot light flame.</i></p>
<p><i>II. Indicator Range</i></p> <p><i>QIP Threshold</i></p>	<p><i>The indicator level is when the pilot light flame is not detected during loading operations.</i></p> <p><i>The QIP threshold level is when the absence of flame is detected more than ten times in a six-month period during gasoline loading operations.</i></p>
<p><i>III. Performance Criteria</i></p> <p><i>A. Data Representativeness</i></p> <p><i>B. Verification of Operational Status</i></p> <p><i>C. QA/QC Practices</i></p> <p><i>D. Monitoring Frequency</i></p> <p><i>Data Collection Procedures</i></p> <p><i>Averaging Periods</i></p>	<p><i>The UV beam detector is located at the pilot light in accordance with manufacturer's recommendations.</i></p> <p><i>NA</i></p> <p><i>The UV beam detector is calibrated in accordance with company procedures, consistent with manufacturer recommendations or acceptable engineering practices.</i></p> <p><i>Continuous during gasoline loading operations.</i></p> <p><i>The presence of the pilot light flame is continuously measured by the UV flame detector and recorded by PRV data recorder during gasoline loading operations.</i></p> <p><i>None.</i></p>

- Reporting** [15A NCAC 2Q .0508(f)]
- d. If gasoline is loaded in this source (**ID No. TLR1**), the Permittee shall submit a summary report of all monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

In addition to this placeholder language, the renewed permit includes a statement of non-applicability for the non-CAM applicable sources (**ID Nos. TLR1\*, RLR and MLR**). Section 2.3 has been added to the permit as follows [\*CAM applies to this source when loading gasoline. See Section 2.1 D.4]:

**2.3- Multiple Emission Source(s) Specific Limitations and Conditions**

- A. **One tank truck loading rack utilizing a submerged-boom loading arm (ID No. TLR1), and One railcar loading rack utilizing a submerged-boom loading arm (ID No. RLR), with associated vapor combustion unit (ID No. ZTOF01)**

**One marine loading rack (ID No. MLR) utilizing a submerged-boom loading arm with associated packed bed scrubber (ID No. SC01)**

The following table provides a summary of limits and standards for the emission source(s) described above:

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
-	Compliance Assurance Monitoring	15A NCAC 2D .0614

- 1. **15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING** - Pursuant to 15A NCAC 2Q .0512(a)(1)(B) “Permit Shield and Application Shield, with the issuance of this permit (05870T14), the following stipulation of non-applicability has been made:

- a. *Permitted sources (ID Nos. TLR1, RLR, and MLR) have been determined to qualify for an exemption from requirements of 40 CFR Part 64 as being subject to an emissions cap that is approved under the rules of Subchapters 15A NCAC 2D and 2Q and incorporated in a permit issued under 15A NCAC 2Q .0500.*

*Therefore, CAM has been determined to not be applicable to these specific sources, except during periods of loading gasoline in tank truck loading rack 1 (ID No. TLR1) covered under Section 2.1 D.4 above, or their associated control devices as described above.*

**VII. Facility Wide Air Toxics**

The Permittee is currently subject to a State-enforceable only permit condition for the control of air toxics facility-wide. Specifically, emissions of acetic acid, ethyl acetate, ethylenediamine, glycol ethers, N-hexane, MEK, MIBK, styrene, sulfuric acid, toluene, and xylene are subject to one- and 24-hour loading rates for the following equipment:

- Truck loading rack No. 1 (**ID No. TLR1**)
- Truck loading rack No. 2 (**ID No. TLR2**)
- Railcar loading rack (**ID No. RLR**)
- Simultaneous operation of **TLR1 and TLR2**
- Simultaneous operation of **TLR2 and RLR**
- Internal Floating Roof Tanks (**ID No. IFR Tanks; 203-211, 213-215, 219-220, and 225**), and Fixed Tanks (**ID No. FR Tanks; 216-218, and 221-224**).

The Permittee is required to maintain daily and annual records of the operational information to determine compliance with 15A NCAC 2D .1100. No modifications are necessary as part of this permit action; continued compliance is expected.

However, as part of this renewal application, the Permittee has requested reporting requirement modifications; specifically the recordkeeping requirements for loading and filling of HAPs. The Permittee has requested modifications such that records are required in the event that the Permittee cannot demonstrate that physical limitations of the emissions units ensure that the relevant operational limitations cannot be exceeded. Section 2.2 A.1.i as proposed is to read:

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- i. *The Permittee shall maintain records of the process operational information necessary to determine compliance with 15A NCAC 2D .1100. Daily records shall be made of the above listed 1-hour and 24-hour loading and filling operations to verify the operational limitations requirement ~~only if the Permittee cannot demonstrate that the physical limitations of the emission units specified in this condition ensure that the applicable operational limitations cannot be exceeded. The Permittee shall demonstrate that the volume of any trucks or railcars loaded on the same day is less than 350,000 gallons. As an alternative, the Permittee may demonstrate that the physical limitations of the system would prevent the above operational limits from being exceeded, or the Permittee may demonstrate that operational limits have not been exceeded by recording the number of rail cars and/or trucks loaded in a 24-hour period. In addition, annual records will be made of the above listed loading rack operations (that include calculations based on methodology approved by the Division) to verify the operational limitations of this requirement.~~ The Permittee shall also maintain any other records as necessary to determine compliance with 15A NCAC 2D .1100. All records of compliance shall be maintained in a logbook and made available for inspection by personnel of the Division of Air Quality.*

It should be noted that the Permittee used permit 05870T12 as the basis for this request. Subsequently following the submittal of the renewal application, permit 05870T13 was issued with Section 2.2 A.1.i as already being modified as follows:

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- i. *The Permittee shall maintain records of the process operational information necessary to determine compliance with 15A NCAC 2D .1100. Daily records shall be made of the above listed 1-hour and 24-hour loading and filling operations to verify the operational limitations requirement. In addition, annual records will be made of the above listed loading rack operations (that include calculations based on methodology approved by the Division) to verify the operational limitations of this requirement. The Permittee shall also maintain any other records as necessary to determine compliance with 15A NCAC 2D .1100. All records of compliance shall be maintained in a logbook and made available for inspection by personnel of the Division of Air Quality.*

Therefore, the approved modified Section 2.2 A.1.i will be as follows:

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- i. *The Permittee shall maintain records of the process operational information necessary to determine compliance with 15A NCAC 2D .1100. Daily records shall be made of the above listed 1-hour and 24-hour loading and filling operations to verify the operational limitations of this requirement. As an alternative, the Permittee may demonstrate that the physical limitations of the system would prevent the above operational limits from being exceeded. The Permittee shall also maintain any other records as necessary to determine compliance with 15A NCAC 2D .1100. All records of compliance shall be maintained in a logbook and made available for inspection by personnel of the Division of Air Quality.*

## VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	0.36	0.43
NO <sub>x</sub>	1.4	1.5
PM <sub>10</sub>	0.12	0.16
SO <sub>2</sub>	5.50	5.9
VOC	66.76	16.95
Total HAP	60.18	13.81

## IX. Stipulation Review

In her September 21, 2007 inspection report, Lynette Bryan of the WiRO did not indicate any required permit stipulation modifications. In addition, she stated that “based on the visual observations made on the date of the inspection, the facility appeared to be in compliance with the applicable regulations.”

The WIRO was presented a DRAFT renewed permit prior to the public notice period. The majority of the comments were typographical in nature and were corrected. However, WIRO did request that the permit conditions for both MACT and PSD avoidance be modified to require testing of the subject control devices once per permit cycle using the latest testing date as the base for the scheduling. In addition, the current permit conditions should also be modified to reflect the results of the collection and destruction efficiency testing performed on **June 5, 2007**. *Agree, the permit conditions have been modified as follows:*

- 1. Subsequent testing will be required by **June 5, 2012** (five years from previous test). However only destruction testing will be required. In its review of the **June 5, 2007** testing, DAQ SSCB noted “the VOC test results and the resulting destruction efficiency are acceptable. However, collection efficiency could not be determined due to insufficient testing methods. Futhermore, SSCB does not see how collection efficiency can be testing for this type of source. Collection efficiency is typically tested using a temporary total enclosure over the source. SSCB does not feel this is feasible for truck and rail loading racks...SSCB recommends using an estimated collection efficiency of 98.7% which is the value for leak checking in compliance with 40 CFR Subpart XX.” Therefore the requirement for completing collection efficiency will be removed and assumed to be 98.7% as described.*
- 2. CE (overall control efficiency) has been established as approved by DAQ SSCB. A VOC collection efficiency of 98.7% as noted above and a VOC destruction efficiency of 93.8% as determined in **June 5, 2007** equates to an overall control efficiency of 92.58%. This percentage has been added to the renewed permit.*

## X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of South Carolina is an affected state.

## **XI. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WiRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

RCO concurs with WiRO's recommendation to issue the renewed air permit.