

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX/XX/2006

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100268
Inspector's Name: Hilary King
Date of Last Inspection: 09/15/2005
Compliance Code: W/In Violation W/Regard To Proc Compliance

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Plantation Pipe Line Company CDS No.: 3708100268 Facility Address: Plantation Pipe Line Company 6907A West Market Street Greensboro, NC 27409 SIC: 4613 / Refined Petroleum Pipe Lines NAICS: 48691 / Pipeline Transportation of Refined Petroleum Products Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 2D .0925, .0927 and .0933 NSPS: 2D .0524 (Subpart K) NESHAP: 2D .1111 (MACT Subpart R) PSD: PSD Avoidance: NC Toxics: 112(r): Other: 2D .1806 (Odor – State-only)
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100268.04A Date Received: 04/30/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03980/T09 Existing Permit Issue Date: 10/10/2001 Existing Permit Expiration Date: 12/31/2004
Murray Clayton, Jr. Operations Manager (336) 547-3661 6907A West Market St. Greensboro, NC 27409	Earl J. Crochet Director - Field Operations (225) 778-2320 1435 Windward Conc. Alpharetta, GA 30005	Matt Marra Corp. Compliance Mgr. (770) 751-4160 1435 Windward Conc. Alpharetta, GA 30005	
Review Engineer: Jeff Twisdale Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 03980/T10 Permit Issue Date: XX/XX/2006 Permit Expiration Date: XX/XX/2011	

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 (03980T09) was issued on October 10, 2001 and expired on December 31, 2004. The renewal application was received on April 30, 2004 by the Raleigh Central Office (RCO) and deemed complete on October 12, 2005 after the Responsible Official (RO) was verified. The renewal application was received less than nine months prior to the expiration date. Normally, the existing permit would not expire until the renewal permit has been issued or denied with submittal of a complete and timely application. The terms and conditions of the existing permit should remain in effect until the renewal permit has been issued or denied.

II. Facility Description

Plantation Pipe Line Company (PPLC) operates as a petroleum pipeline breakout station that directs liquid petroleum products to customers downstream along the pipeline including many of the local bulk terminals.

III. History/Background/Application Chronology

January 21, 2000 – Initial Title V permit (03980T07) issued by Lesley Biller.

March 1, 2000 – Administrative amendment (revised permit 03980T08) of the permit pursuant to 2Q .0514 issued by Michael Brandon.

October 10, 2001 – 502(b)(10) modification (revised permit 03980T09) of permit to modify the tank rim seal systems on tanks (ID Nos. GN115, GN116, GN117, GN119 and GN120) issued by Wanda Hinnant.

April 30, 2004 – Received application for renewal of existing Title V permit. This modification will be processed as a renewal pursuant to 2Q .0513. Renewal application originally assigned to Ken Babb.

June 5, 2004 – DAQ requested additional information regarding the responsible official designation.

July 29, 2005 – Permit renewal application reassigned to Jeff Twisdale.

October 12, 2005 – Responsible Official verified. Permit renewal application deemed complete for processing.

February 10, 2006 – DRAFT permit forwarded to Title V permit coordinator (Charlie Yirka) for review.

February 10, 2006 – DRAFT permit sent to PPLC and WSRO for review via email.

February 17, 2006 – Received updated E5 Form signed by the current Responsible Official

February 17, 2006 – Comments on DRAFT permit received from PPLC via email. See Section XII of this document for a discussion.

February 20, 2006 – Comments on DRAFT permit received from WSRO via email. See Section XII of this document for a discussion.

IV. Permit Modification/Changes

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

(Note: See Section III of this document for a description of the modifications).

Old Page(s)	New Page(s)	Section	Description of Change(s)
NA	NA	Cover Letter	-Updated responsible official name and address
NA	NA	Attachment	-Added insignificant activity list for affected sources
3 – 6	3 – 5	Part 1, Section 1 (Equipment table)	-Updated emission source description for gasoline storage tanks to more accurately reflect the “tank rim seal system” operation as process equipment while removing the existing control device description
3 – 6	3 – 5	Part 1, Section 1 (Equipment table)	-Added notation (MACT) for all gasoline storage tanks that are subject to MACT Subpart R
6	5	Part 1, Section 1 (Equipment table)	-Removed sources that are insignificant (< 5 tpy) and moved to the insignificant activities list (attachment)
6	5	Part 1, Section 1 (Equipment table)	-Added notation (*) and 2Q .0508(z) reference for permitting of sources with no applicable requirements
12	11	2.1 F	-Removed “No Applicable Requirements” sources, including heading and table, and moved the sources to the insignificant activities list (attachment)
12	11	2.1 G	-Shifted “all emission sources” and 2D .1806 table and condition up from 2.1 G to 2.1 F
13-20	12-19	General Conditions	-Updated all general conditions with latest version

V. Regulatory Review

The facility is subject to the following regulations:

- 15A NCAC 2D .0925: Petroleum Liquid Storage in Fixed Roof Tanks
- 15A NCAC 2D .0927: Bulk Gasoline Terminals
- 15A NCAC 2D .0933: Petroleum Liquid Storage in External Floating Roof Tanks
- 15A NCAC 2D .0524: New Source Performance Standards (40 CFR 60 Subpart K)
- 15A NCAC 2D .1111: Maximum Achievable Control Technology (40 CFR 63 Subpart R)
- 15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions (*State-enforceable only*)

No new or additional requirements have been added to this renewed permit since the Initial Title V Permit was issued. Therefore, a specific regulatory review will not be included in this document.

VI. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

The facility (specifically three tanks (ID Nos. GN153, GN154 and GN155)) is subject to New Source Performance Standard (NSPS) (specifically 40 CFR Subpart K) and has been complying with the standard.

NESHAP/MACT

The entire facility is subject to Gasoline Distribution MACT (40 CFR 63 Subpart R) and has been complying with the standard since the compliance date (12/15/1997). Only the equipment in gasoline service is required to meet the standards. There are no tank truck or railcar loading racks at the facility so MACT compliance is mainly concerned with the gasoline storage vessels (> 19,813 gallons) that will be required to comply with the testing, monitoring, recordkeeping and reporting requirements of NSPS Subpart Kb and with equipments leaks.

PSD/NSR

This existing facility is considered to be a major stationary source for PSD/NSR purposes because the facility emits more than 100 tons per year (tpy) of volatile organic compounds (VOCs). Please note that the facility is classified as one of the 28 named source categories (i.e. 100 tpy source) for PSD/NSR purposes since the facility transfers petroleum and has a storage capacity greater than 300,000 barrels. The minor source baseline has been triggered in Guilford County for particulate matter less than 10 microns in diameter (PM-10) and sulfur dioxide (SO₂). No increase of any emissions is expected during the renewal process.

Attainment Status

This facility is located in Guilford County that is currently in attainment for all pollutants **except** for **ozone** and particulate matter, 2.5 microns in diameter or less, (**PM-2.5**); however, the Triad Area (Greensboro/Winston-Salem/High Point) is part of the Early Action Compact (EAC) and is considered to be attainment for **ozone** as long as the status reports of the EAC are submitted timely. The Triad Area must attain national air quality standards for 8-hour **ozone** no later than June 2007. EPA designated Guilford County as non-attainment for **PM-2.5** on December 17, 2004. No increase of any emissions is expected during the renewal process.

112(r)

This facility is NOT subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

40 CFR 64 requires that a continuous 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. This facility does NOT utilize control devices; therefore, CAM does not apply.

VII. Facility-wide Air Toxics

The facility is NOT subject to the state-only toxics regulations (2Q .0700) since bulk gasoline terminals, including storage and handling, are exempt pursuant to 2Q .0702(a)(28). The facility-wide air toxics review required by the compliance date of the last applicable MACT pursuant to 2Q .0705 was NOT required.

VIII. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on visual observations and review of records at the time of the inspection (09/15/2005 by Hilary King), this facility appeared to be operating in compliance with Air Quality standards and regulations. Please note that the facility has received two Notices of Violation (NOV) for late Title V Annual Compliance Certifications (2003 & 2004) that are due by January 30th.

IX. Facility Emissions Review

There is no change in emissions for this renewal. The following table represents facility-wide actual emissions as submitted by the facility in its latest (2004) emissions inventory:

Pollutant	2004 Emissions (tons per year)
Volatile Organic Compounds	167
Methyl tertiary butyl ether (MTBE)	7.68
Toluene	1.42
Xylene	1.06
Benzene	0.69
(all other HAPs/TAPs)	< 1 ton

X. Stipulation Review

The permit modification/changes (where needed) were incorporated into the permit (see table of changes in Section IV of this document).

XI. Public Notice / EPA and Affected State Review

Pursuant to 2Q .0521, a notice of the draft Title V Permit will 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 will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. Forsyth County and Virginia are considered to be affected States for this facility.

XII. Conclusions, Comments, and Recommendations

1. A professional engineer's seal was not required for this renewal.
2. A consistency determination was not required for this renewal.
3. WSRO recommends issuance of the permit after completion of the public notice and EPA review periods.
4. Comments received on DRAFT permit:

WSRO

- Comments were received via e-mail from Hilary King of WSRO on February 20, 2006 stating that WSRO had no problems with the DRAFT permit prior to public notice and EPA review periods.

PPLC

- Facility requested that sources (ID Nos. GNRT-1 and GNSUMP7), Building Heating Units, and a 250-gallon product recovery tank be added as Insignificant Activities as requested in the application.