

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)  
 TITLE V OPERATING PERMIT REVIEW REPORT**

**SFPP, L.P. – Eugene Terminal  
 1765 Prairie Road  
 Eugene, OR 97402**

**Source Information:**

SIC	4226
NAICS	424710

Source Categories (Title 37, Table 1: Part and Code)	B.31: Gasoline bulk plants, bulk terminals, and pipeline facilities
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**Compliance and Emissions Monitoring Requirements:**

Unassigned emissions	8
Emission credits	NA
Compliance schedule	NA
Source test [date(s)]	See Permit

COMS	NA
CEMS	NA
CPMS	X
Ambient monitoring	NA

**Reporting Requirements**

Annual report (due date)	March 15
Emission fee report (due date)	March 15
SACC (due date)	August 15
Quarterly report (due dates)	NA

Monthly report (due dates)	NA
Excess emissions report	Immediately
Other reports	GHG

**Air Programs**

NSPS (list subparts)	K, Kb, XX
NESHAP (list subparts)	BBBBBB
CAM	Yes
Regional Haze (RH)	NA
Synthetic Minor (SM)	Yes (HAPs)
Part 68 Risk Management	NA
Title V	Yes
ACDP (SIP)	Construction
Major HAP source	No
Federal major source	NA

NSR	NA
PSD	NA
Acid Rain	NA
Clean Air Mercury Rule (CAMR)	NA

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT**

ACDP	Air Contaminant Discharge Permit	MSF	1,000 Square feet 3/8” basis
Act	Federal Clean Air Act	MSDS	Material Safety Data Sheets
ASTM	American Society of Testing and Materials	NA	Not applicable
BER	Baseline Emission Rate	NCA	Notice of Civil Penalty
Btu	British thermal unit	NO <sub>x</sub>	Nitrogen oxides
CAM	Compliance Assurance Monitoring	NESHAP	National Emission Standard for Hazardous Air Pollutant
CEMs	Continuous emission monitoring system	NON	Notice of Non-Compliance
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
CO <sub>2</sub>	Carbon Dioxide	O <sub>2</sub>	Oxygen
CO <sub>2e</sub>	Carbon Dioxide Equivalent	OAR	Oregon Administrative Rules
CPMS	Continuous parameter monitoring system	ORS	Oregon Revised Statutes
DEQ	Department of Environmental Quality	O&M	Operation and maintenance
dscf	Dry standard cubic feet	PAH	Polycyclic Aromatic Hydrocarbon
EF	Emission factor	Pb	Lead
EPA	US Environmental Protection Agency	PCD	Pollution Control Device
ERC	Emission Reduction Credit	PM	Particulate matter
EU	Emissions Unit	PM <sub>10</sub>	Particulate matter less than 10 microns in size
F	Fahrenheit	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
FCAA	Federal Clean Air Act	POM	Polycyclic Organic Matter
FSA	Fuel sampling and analysis	ppmv	Parts per million by volume
GHG	Greenhouse Gas	ppm	Parts per million
gpm	gallons per mile	PSEL	Plant Site Emission Limit
gr/dscf	Grain per dry standard cubic foot (1 pound = 7,000 grains)	psia	pounds per square inch, actual
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RVP	Reid Vapor Pressure
HCFC	Halogenated Chloro-Fluoro-Carbons	SCAQMD	South Coast Air Quality Management District
ID	Identification number	SERP	Source emissions reduction plan
I&M	Inspection and maintenance	SPEC	Special
l	Liter	SO <sub>2</sub>	Sulfur dioxide
lb	Pound	ST	Source test
LRAPA	Lane Regional Air Protection Agency	THC	Total Hydrocarbons
mg	milligram	VCS	Vapor Control System
M	1,000	VE	Visible emissions
MM	1,000,000	VMT	Vehicle miles traveled
MB	Material Balance	VOC	Volatile organic compounds
		VCU	Vapor Combustion Unit
		VRU	Vapor Recovery Unit

## PERMITTEE IDENTIFICATION

1. Kinder Morgan's subsidiary SFPP, L.P. – Eugene Terminal owns and operates a petroleum products distribution terminal facility located at 1765 Prairie Road in Eugene, Oregon.  
[https://www.kindermorgan.com/business/products\\_pipelines/eugene.aspx](https://www.kindermorgan.com/business/products_pipelines/eugene.aspx)

## PHYSICAL CHANGE APPROVED UNDER C-ACDP AND ROLLED INTO TITLE V PERMIT

2. This Administrative Amendment rolls the Construction Air Contaminant Discharge Permit (C-ACDP) into the Title V Permit that allows for the installation of a new VCU that will replace the existing Vapor Recovery Unit (VRU): Edwards Refrigeration for the EU: TRACK. The new VCU system will utilize a thermal oxidizer (enclosed flare), with an 80 MMBtu/hour, four (4) burner, air-assisted, John Zink Enclosed Flare and a holding bladder that will be installed in Tank EG-07, to control the vapors recovered from the loading rack operations (EU: TRACK) and releasing the emission from the loading racks at steady rate to the VCU.

A C-ACDP was required for the proposed installation of VCU because it will result in the addition of applicable requirements in the permit and the addition of new emitted air pollutants from the combustion of the hydrocarbon vapors. The new pollutants are PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and GHGs. The VOCs emissions will remain the same as the current permit. The facility requested a limit of 39 tons of NO<sub>x</sub> to remain below the significant emission rate (SER) and therefore, not triggering a State Type A permit review.

The C-ACDP did not allow for the operation of the proposed VCU and associated equipment but is being rolled into the Title V permit as an Administrative Amendment since the appropriate notice procedures were followed in accordance with the Title V rules.

The facility requested that the Title V external review procedures be used in addition to the ACDP public notice procedures to allow for subsequent incorporation of the construction permit as an administrative amendment.

This C-ACDP did not address any changes in State or Federal regulations which are applicable to the facility. Nor will it make any changes to any existing Title V operating permit conditions at this time. Any required changes in permitted operating conditions will be made when the Title V operating permit is renewed.

## FACILITY DESCRIPTION

3. SFPP, L.P. – Eugene Terminal (SFPP or Facility) received refined fuels from Portland via 8-inch pipeline, truck, or railcar and transfers gasoline and diesel from the storage tanks into tanker trucks via one (1) of four (4) loading racks. Denatured ethanol is stored and distributed at the Eugene facility via truck. Gasoline and diesel additives are typically received by truck.

A variety of petroleum products including gasoline, diesel, transmix, ethanol (oxygenate), and proprietary customer fuel additives are stored in aboveground storage tanks. The higher volatility products including gasoline, transmix (a combination of gasoline, diesel, and/or jet fuel), and denatured ethanol are stored in floating roof tanks (external and internal floating roofs) due to their higher vapor pressures. Less volatile products including diesel and fuel additives are stored in fixed-roof tanks and horizontal tanks, as well as the floating roof tanks.

The facility receives petroleum fuels and stores these fuels in bulk petroleum product storage tanks. Fuel products are blended with additives and oxygenates as required, and these products are distributed to tanker trucks. At the facility there are forty-one (41) bulk petroleum product storage tanks, where thirty-five (35) storage tanks are permitted and nine (9) are currently out of service. There is also a water holding tank. SFPP has tanks for storage of gasoline, diesel, and ethanol. Tank types include fixed roof, internal floating roof, and external floating roof. Emissions are comprised of working losses, rim seal losses, and deck fitting/seam losses. The equipment at the facility includes twelve (12) vertical fixed roof tanks, fifteen (15) internal floating roof tanks (including a domed

external roof tank), eight (8) external floating roof tanks, an oil water separator, nine (9) (including one (1) tote) additive tanks, four (4) loading racks, one unloading rack, one prover, two (2) sumps (main line and rack sumps), and one vapor recovery unit for the loading racks.

Out of Service Tank Numbers
EG-06
EG-07
EG-21
EG-28
EG-29
EG-30
EG-31
EG-33
EG-34

Petroleum products from the tanks are dispensed to the loading racks. The loading racks consist of one or more “bays” with each bay able to accommodate one tanker truck. Each storage tank is connected via underground and aboveground pipelines to a manifold where it can be directed to one or more of the four loading racks or another storage tank. Petroleum fuels are conveyed to a given loading rack and are pumped into a customer tanker truck via one or more bottom-loading arms. No processing of incoming materials, other than blending, is performed at the facility.

Transmix is a mixture of different petroleum fuel products that forms at the interface between products conveyed together in a pipeline or generated through normal maintenance and operations activities. This mixture is received at the terminal, stored in specified tanks, and transferred at the loading racks to trucks for offsite processing. Separation of the transmix constituents is not conducted at the facility.

**EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION**

4. The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
All fixed-roof storage tanks at the facility with a rated capacity great than 39,000 gallons	FIXTANK	None	NA
All internal floating-roof storage tanks at the facility	INTANK	None	NA
All external floating-tanks at the facility	EXTANK	None	NA
Tanker truck and trailer Loading Racks 1, 2, 3, and 4 including fugitives and Unloading Rack 5	TRACK	Vapor Recovery Unit: (Refrigeration Type) OR Vapor Combustion Unit: (Thermal Oxidizer Type)	VRU or VCU
VOC emissions from Flanges, Valves, Pumps, etc. at the Terminal	FGTVOC	None	NA
Water/Oil Separator	OWS	None	NA

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Aggregate Insignificant Activities: Ethanol Offloading Product Unloading Prover Additive Tanks	AI	None	NA

5. **FIXTANK – Fixed Roof Storage Tanks:** This emission units represents all the fixed roof storage tanks existing at the permitted facility. This type of tank generally consists of a cylindrical steel shell with a permanently affixed roof, which may vary in design from cone (or dome-shaped) to flat. The Eugene Terminal houses a total of twelve (12) fixed roof storage tanks, all of which have a capacity of more than 39,000 gallons. All fixed roof storage tanks currently store volatile liquids with a vapor pressure less than 0.022 psia. Fixed roof storage tank VOC emission are the sum of breathing losses and working losses, which are a function of physical/chemical properties of materials being stored at stored condition, as well as, the physical design of tank itself. This holds true for all types of storage tanks, including EXTANK and INTANK described below.
  
6. **EXTANK – External Floating Roof Storage Tanks:** This emission unit represents all external floating roof storage tanks existing at the terminal. There are eight (8) external floating roof tanks existing at the facility, with capacity ranging from 252,000 to 840,000 gallons. All EXTANK were installed on or before 1984. This type of tank generally consists of a cylindrical shell with an external floating roof that moves with respect to the stored liquid level.
  
7. **INTANK – Internal Floating Roof Storage Tanks:** This emissions unit represents all the internal floating roof storage tanks existing at the permitted facility. The emission unit has both a permanent fixed cone roof and a floating deck inside, which is free to move vertically as the liquid level rises and falls, and either floats on the liquid surface or rests on pontoons several inches above the liquid surface. The facility has a total of fourteen (14) internal floating roof tanks and one (1) domed internal floating roof tank. According to the permit application, there are three (3) internal floating roof tanks, (tanks 17, 18, and 19) constructed in 1973 that are subject to the NSPS requirements of 40 CFR Part 60, Subpart K. There are five (5) internal floating roof tanks (16, 25, 40, 41, and 42) constructed or modified after the year 1984 that are subject to the NSPS requirements of 40 CFR 60, Subpart Kb. Tanks 16 and 25 were modified in 2007/2008 as part of the B07 construction project to increase ethanol offloading and became subject to the NSPS requirements of 40 CFR 60, Subpart Kb. The project involved adding a nozzle on both Tank 16 and 25 that increased the hourly potential to emit of VOC.
  
8. **TRACK – Tanker Truck/Trailer Loading and Unloading Racks:** The emission unit represents the tank truck loading and unloading racks used to distribute various petroleum products. There are a total of four (4) loading racks at the facility with multiple fill positions at each rack. Rack four (4) was constructed in 1984, after the NSPS trigger date along with the vapor recovery unit. There is one (1) unloading rack used to offload ethanol from trucks; rack five (5) was constructed in 2008 to increase ethanol capacity. The affected facility for applicability of NSPS requirements of 40 CFR Part 60, Subpart XX is the total of all loading racks. An analysis of whether reconstruction or modification occurred was not presented. However, for ease of compliance, the facility has chosen to assume that all the loading racks in TRACK are subject to the Subpart XX requirements. With the exception of Rack 5 is for product unloading only and is therefore, not subject to the Subpart XX requirements for loading racks. Both loading racks number 1 and 2 have red-dye injectors for diesel fuel.
  - 8.a. **Existing: Vapor Recovery Unit (VRU):** This is a refrigeration type vapor recovery unit that controls fuel vapors from the loading racks. The VRU is an Edwards Engineering, Inc. model, rated at 93.5% recovery efficiency. The VRU is designed to process a gasoline pumping rate of 2,400 gpm at 35 mg of hydrocarbon per liter. The gases from the loading rack hoses are captured and piped to the VRU. Vapors go to one of two refrigeration units and enter a pre-cooler, cooling vapors between 25- and 50-degrees Fahrenheit. Condensed vapors drain into a decanter while remaining vapors continue to a two-section compartment of the refrigeration unit. The first section cools the condensed vapors to between

0 and -40° F and the second section to between -80 and -90° F. During normal operations the condenser unit cools the vapors to -68° F. The condensed vapors also drain to the decanter and are pumped back to storage. One of the two (2) refrigeration units defrosts several times per day by heating D-Limonine and pumping it through the refrigeration coils to melt any ice buildup.

**Proposed: Vapor Combustion Unit (VCU – Thermal Oxidizer (enclosed flare)):** The VCU is a thermal oxidizer type vapor combustion unit that will control the hydrocarbon vapors from the loading racks. The proposed VCU is a John Zink, 80 MMBtu/hour, 4 burner, air-assisted, temperature controlled enclosed flare that will meet the mass emission limitation of 35 mg/L (0.292 lbs VOC/1,000 gallon). The designed inlet gas flow rate is 1,000 cfm. Tank EG-07 will be converted to a vapor holding tank to hold a vapor bladder. The vapor holder tank will be equipped with alarms to prevent product loading from exceeding capacity of the vapor bladder. The collected vapors will be sent to the VCU for combustion.

9. **FGTVOC – Fugitive VOC emitting sources:** The emissions unit FGTVOG represents fugitive VOC emissions associated with VOC product handling. The pipe transport systems contain numerous valves, flanges, pumps, sampling ports, and other components through which VOC vapors escape. For the purpose of estimating VOC emissions, emissions factors published in EPA’s *Protocol for Equipment Leaks Emission Estimates, US Environmental Protection Agency, Office of Air Quality Planning and Standards, EPA-453/R-95-017, November 1995*, are used. Unless actual emission factors are available for use in the VOC emission calculations, the emission factors as listed in the Title V permit monitoring section should be used. The table below lists the number of each component currently existing at the facility:

Component “i”	Number of Component “i”
Fittings (connectors and flanges)	365
Other (compressors and others)	236
Pumps	94
Valves	1,241

10. **OWS – Oil/Water Separator:** The facility storm drains (containing potentially contaminated rainwater/contact water (effluent) are routed to an enclosed vault and then to the Oil/Water Separators. The water from the OWS is then routed to a holding pond which is periodically pumped through an onsite carbon adsorption system when sufficient quantity builds up. It is then discharged to the City of Eugene storm water drainage ditch. The flowrate depends on rainfall and varies throughout the year. The flowrate depends on rainfall and varies throughout the year.

The VOC emissions from the two OWS were calculated using the emission factor for oil/water separators in Table 5.1-2 of Section 5.1 (Petroleum Refining), *EPA’s AP-42 Compilation of Air Pollutant Emission Factors, January 1995*. This emission factor is 5 lbs/1000 gallons.

The OWS was placed on the emission units list because it no longer qualifies as a categorically insignificant activity per the DEQ amended Oregon Administrative Rules effective April 16, 2015. The OWS with effluent greater than 400,000 gallons per year are considered an emission unit.

11. **Aggregate Insignificant (EU-AI):** Aggregate Insignificant Activities include emissions described below:

Emissions Source	VOC (ton/yr)
Product Unloading	0.305
Ethanol Offloading	0.31

Emissions Source	VOC (ton/yr)
Prover	0.053
Additive Tanks	0.060
<b>Total</b>	<b>0.728</b>

12. Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, gasoline, natural gas, or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant;
  - Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;
  - Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour.
- Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pump, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL.
- Office activities
- Janitorial activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Electrical charging station
- Fire Brigade Training
- Fire suppression
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment

- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads, except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Combustion source flame safety purging on startup

As part of the 2015 renewal, potential emission from the following Categorical Insignificant Activities were estimated by the facility to be:

Emissions Source	VOC (ton/yr)
Sumps	2.45
Vault	5.00
Holding Pond	6.57
<b>Total</b>	<b>14.02</b>

### OPERATING SCENARIO

13. The facility has a single operating scenario.

### EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

14. The following sections describe each applicable requirement in the permit, with the intent of the condition and a brief discussion of any unique features of the requirements.
- 14.a. Conditions 1 includes requirements and information related to the Construction ACDP.
  - 14.b. Conditions 2-7 are the requirements for the installation of the VCU and the incorporating the VCU conditions into the Title V operating permit.
  - 14.c. Conditions 8 is a general statement about the enforceability of permit conditions which are required in and common to all Title V permits issued by LRAPA.
  - 14.d. Condition 9 provides a list of equipment and identification of pollution control devices for the facility.
  - 14.e. Condition 10 and 11 is a facility-wide fugitive dust control requirement that allows the permittee to deal with potential fugitive dust problems before they become standard violations. The reasonable precautions can be required without the need to show a violation. (e.g., dust from traffic on roads).
  - 14.f. Condition 12 implements the sulfur limits by grade of fuel type provision in LRAPA rules.
  - 14.g. Condition 13 describes the required monitoring and recordkeeping to track sulfur limits per fuel type that the facility distributes per Condition 12.
  - 14.h. Condition 14 is a facility-wide nuisance resolution condition that establishes timely response to any complaints that the facility operation may generate.

- 14.i. Condition 15 implements the long-standing particulate matter fallout provision in LRAPA rules. The monitoring and recordkeeping refer back to the periodic visible emission surveys required in Condition 14.a.
- 14.j. Condition 16 is a standard requirement for Title V facilities stating the permittee's responsibility for 40 CFR 68 accidental release provisions should the facility trigger this requirement.
- 14.k. Condition 17-28 lists the Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facility NESHAP requirements from 40 CFR 63 Subpart BBBBBB that applies facility-wide.
- 14.l. Condition 29 lists the annual Plant Site Emission Limits (PSELs) for the facility.
- 14.m. Condition 30 and 31 contains specific notification requirements per 40 CFR 60.7 for EUs: FIXTANK.
- 14.n. Condition 32 and 33 lists the Storage Vessels for Petroleum Liquids NSPS requirements from 40 CFR 60 Subpart K that applies to EU: INTANK, Tanks 17, 18, and 19.
- 14.o. Conditions 34-36 lists the Volatile Organic Liquid Storage Vessels NSPS requirements from 40 CFR 60 Subpart Kb that applies to EU: INTANK, Tanks 16, 25, 40, 41, and 42.
- 14.p. Conditions 37-39 contains the Bulk Gasoline Terminals NSPS requirements from 40 CFR 60 Subpart XX that applies to EU: TRACK.
- 14.q. Conditions 40-42 contains the CAM monitoring requirement for the VRU and VCU for EU: TRACK.
- 14.r. Conditions 43-51 contains local regulations of applicability, monitoring, testing, recordkeeping and reporting that pertain to the Vapor Combustion Unit (VCU) – Thermal Oxidizer (Enclose Flare) for the EU: TRACK.
- 14.s. Conditions 52-54 contains the NSPS and NESHAP monitoring and recordkeeping requirements for EU: FGTVOG.
- 14.t. Condition 55 contains the particulate matter grain loading and opacity limitations that apply to the Insignificant Emission Units or Activities (IEU).
- 14.u. Condition 56 specifies that no testing is required for IEU but, if tested, requires testing be completed in accordance with standard testing requirements.
- 14.v. Condition 57 lists the emission fees based on the PSEL component for each emission unit.
- 14.w. Condition 58 contains the general testing requirements.
- 14.x. Conditions 59-61 contains the general monitoring requirements for the facility.
- 14.y. Conditions 62-65 contains the general recordkeeping requirements for the facility.
- 14.z. Conditions 66-70 contains the general reporting requirements for the facility.
- 14.aa. Condition 71-73 lists the semi-annual and annual report requirements for the facility.
- 14.bb. Condition 74 specifies the non-applicable requirements that could reasonably be considered to apply to the facility.

#### **EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES**

- 15. As identified earlier in this Review Report, this facility has insignificant emissions units (AI) that include categorically insignificant activities and aggregate insignificant emissions, as define in LRAPA Title 12 and/or OAR 340-200-0020. For the most part, the standards that apply to AI are for opacity (20% limit) and particulate matter (0.10 gr/dscf limit). LRAPA does not consider it likely that AI could exceed an applicable emissions limit or standard because AI are generally equipment or activities that do not have any emission controls (e.g., small natural gas-fired space heaters) and do not typically have visible emissions. Since there are no controls, no

visible emissions, and the emission are less than one (1) ton per year, LRAPA does not believe that believe that monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

**PLANT SITE EMISSION LIMITS**

16. Provided below is a summary of the baseline emission rate, netting basis, plant site emission limit and emissions capacity.

Pollutant	Baseline (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			PTE (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)	
PM	0	0	0	0	24	24	3
PM <sub>10</sub>	0	0	0	0	14	14	3
PM <sub>2.5</sub>	NA	NA	0	NA	9	9	3
CO	0	0	0	0	99	99	12
NO <sub>x</sub>	0	0	0	0	39	39	44
SO <sub>2</sub>	0	0	0	0	0	0	0.20
VOC	480	480	480	472	472	0	472
Single HAP	0	0	0	9	9	9	9
Total HAP	0	0	0	24	24	0	24
Pb	0	0	0	0	0	0	0
GHG	0	0	0	0	74,000	74,000	45,520

- 17. A baseline emission rate was not required for PM<sub>2.5</sub> in accordance with the definition of “baseline emission rate” in LRAPA Title 12.
- 18. The baseline emission rate for greenhouse gases (GHGs) are zero (0) because the facility did not operate any source that emitted GHGs between the baseline period of calendar years of 2000-2010.
- 19. The PSEL for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and NO<sub>x</sub> were installed into the table for the proposed combustion emission for the VCU.
- 20. There is no change to the netting basis for the pollutants with newly-established PSELs (PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and NO<sub>x</sub>). Increases to the netting basis is approved through Major NSR, Type A State NSR, or PSD action under title 38. The pollutants with newly-established PSELs are below the SER and therefore, the action did not trigger a Major NSR or Type A State NSR action, so the netting basis for each of these pollutants remains zero (0). [LRAPA 42-0046(3)(e)]
- 21. Baseline emissions rate (BER) for VOC is based on 1984 actual emissions for the facility. Emissions from 1977-78 were reportedly unavailable. At the time of the permit application submittal of 2000, SFPP reportedly defended its use of 1984 data by stating that emissions had decreased from the 1977-78 period. Emission reduction projects implemented in that time period were tank and tank seal improvements, and elimination of top-loading of tanker trucks. Uncontrolled splash loading of gasoline, a major contributor to emissions, continued through the end of 1984. In 1984, the applicant installed a vapor collection system (VCS) in accordance with the 40 CFR 60 Subpart XX. The significant emission reduction is required by rule and must be discounted from the netting VOC BER (i.e., it cannot be used for credits or internal offsets). The netting BER for VOC for this facility was reset to present emission levels to account for VRU. The calculations use TANKS 3.1 methodology to estimate emissions from the storage tanks. Estimated loading emissions prior to installation of the VCS are 1,778 tons per year. The total throughput in 1984 was 368,299,974 gallons per year.

Baseline Changes for 2008 Title V permit: The facility requested a change in the baseline emissions to reflect better information with the renewal application received in 2005. The previous baseline emissions estimations did not account for fugitive emissions at the loading racks. The addition of the rack fugitives, which had been present in the baseline year but not accounted for, changed the total baseline emission rate for VOC for 418.6 to 480 tons per year. Unassigned Emissions in the amount of 1.6 tons per year. Are based on voluntary “out of service” commitment for emission units EXTANKS – Tanks 21, 27, 28, 29, 31, 33, and 34.

Other Baseline Changes: PM and PM<sub>10</sub> for paved roads (Emission Unit FGTPM) was removed from the baseline emission rate and PSEL as part of the 2007 renewal because fugitive particulate matter from paved roads is specifically identified as a categorically insignificant activity (CIA) in the Oregon Title V rules. The Oil/Water Separator was taken off the Categorically Insignificant Activities (CIA) list and added to the emission units list per amended Oregon Administrative Rules effective April 16, 2015.

**UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS**

- 22. The facility has eight tons (8 tons) of VOC as unassigned emissions. The facility does not have any emission reduction credits at this time.

**SIGNIFICANT EMISSION RATE**

- 23. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 12 for all of the pollutants as shown below:

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Unassigned Emissions (tons/year)	SER (tons/year)
PM	---	24	---	25
PM <sub>10</sub>	---	14	---	15
PM <sub>2.5</sub>	---	9	---	10
CO	---	99	---	100
NO <sub>x</sub>	---	39	---	40
SO <sub>2</sub>	---	---	---	40
VOC	480	472	8	40
Pb	---	---	---	0.06
GHG	---	74,000	---	75,000

- 24. There have been no physical modifications at the facility that would have required a New Source Review or have met the LRAPA definition of a major modification since the baseline period. Previously insignificant emission units or activities were incorporated into this renewal permit because it was determined through calculations that they should be accounted for as emission units.

**HAZARDOUS AIR POLLUTANTS**

- 25. The following is the potential to emit (tons per year) of the facility for hazardous air pollutants listed in Section 112(b) of the 1990 Clean Air Act Amendments (CAAA). The emissions totals below reflect the maximum HAP emissions from the facility. The table demonstrates that the facility emits less than ten (10) tons per year of any single HAP and less than 25 tons per year of total HAPs. SFPP is considered an area source of HAP and is subject to 40 CFR 63 Subpart BBBB.

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Hexane	7.9
Benzene	4.1

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Toluene	5.8
2,2,4-Trimethylpentane	3.6
Xylene	2.3
Ethyl Benzene	0.5
POM as 16-PAH (Naphthalene)	0.2
<b>Total</b>	<b>24.4</b>

**FEDERAL REQUIREMENTS**

26. The applicability of various federal requirements is as follows:

26.a. **Accidental Release:** The source has certified that the facility is not subject to 40 CFR Part 68, which requires a risk management plan for toxic and flammable substances releases.

26.b. **Compliance Assurance Monitoring (CAM):** The CAM rule, 40 CFR Part 40, applies to emission unit: TRACK. Compliance Assurance Monitoring for this unit is as follows:

26.b.i. **VRU: Edwards Refrigeration Unit:** The temperature will be continuously recorded of the refrigeration coils in the VRU. Whenever the TRACK is in operation. The facility is required to take corrective action if the temperature exceeds above -68° Fahrenheit, averaged over the emission control cycle. Records must be maintained of temperatures, maintenance, excursions, and excess emissions and corrective actions taken.

26.b.ii. **VCU: John Zink Enclosed Flare:** The Compliance Assurance Monitoring (CAM) Plan for the Vapor Combustion Unit – thermal oxidizer – enclosed flare (VRU), was develop in accordance with 40 CFR Section 64.3, “Monitoring design criteria”. The collected vapors from EU: TRACK will be routed to a vapor holding tank (Tank EG-07). When the vapor tank bladder reaches an approximate height of 18 feet, the vapors will be released to the VCU. The parameter to be monitored will be the exhaust stack temperature and is performed continuously with a thermocouple. Periodic inspection and maintenance of the burner system will also be another element of the requirement of this section.

40 CFR 64: CAM has been evaluated for the facility’s installation of a new VCU – Thermal Oxidizer: Enclosed Flare

Pollutant	Does the EU: TRACK emit over 100 tons of the pollutant per year	Does the EU: TRACK have a Control Device for this Pollutant	Is there an Emission Limitation or Standard for this Pollutant	Is EU: TRACK Subject to CAM for the Pollutant
PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , and SO <sub>2</sub>	No	No	No	No
VOC	Yes	Yes	Yes	Yes

The inspection and maintenance work practice comprised of an annual inspection (including tuning) of the VCU burners was selected because this verifies equipment integrity and periodic tuning will maintain proper burner operation and efficiency. The thermocouple will be located in the stack and the temperature will be monitored via a Programmable Logic Computer (PLC). The PLC employs temperature-controlled feedback that maintains the desired temperature to

combust the VOC emissions from the EU: TRACK efficiently and with compliance with the mass emission limit.

The rationale for selection of performance indicators: The temperature was selected as a performance indicator because it is indicative of proper flare operation (combustion occurring within the chamber). If the temperature decreased below a specified set point, in this case 600°F, complete combustion may not occur. This potentially could cause the mass emission limitation of 35 mg/l (0.292 lb VOC/1,000 gallons) to be exceeded. The proper temperature operation will achieve compliance with the emission limitation. The work practice of inspecting and maintenance on an annual basis, which would include the tuning of the burners will be utilized because it verifies equipment's integrity and periodic tuning will maintain proper burner operation and efficiency. The facility will follow the manufacturer's suggested maintenance practices as applicable which further ensure reliable operation. The annual inspection of the vapor system according to the manufacturer's suggested maintenance practices as applicable will be followed to ensure reliable operation.

Per 40 CFR 64.7(d): (1) The response to excursions or exceedances, the facility will restore operation to its normal or usual manner as expeditiously as practicable. The response will include taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance. Such actions may include initial inspection and evaluation, recording the operations returned to normal without operator action, or necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (2) Determination of whether the facility has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. Based on the determination made under 40 CFR 61.7(d)(2), the Administrator may require SFPP to develop and implement a Quality Improvement Plan (QIP).

General Criteria	Indicator #1	Indicator #2	Indicator #3
Parameter	Exhaust Stack Temperature	Work Practice – Inspection and Maintenance	Work Practice – Inspection and Maintenance
Measurement Approach	Monitored continuously with a thermocouple	Periodic inspection and maintenance of the burner	Periodic inspection and maintenance of the vapor compressor
Indicator Range	At or above 600° F	Annual inspection and manufacturer's recommended maintenance frequency.	Annual inspection and manufacturer's recommended maintenance frequency.
<b>Performance Criteria</b>			
Data Representativeness	The thermocouple will be located 20' up the stack, or approximately 16.5' above the burner tips. The minimum tolerance of the thermocouple will be determined once a manufacturer is selected.	NA	NA

General Criteria	Indicator #1	Indicator #2	Indicator #3
	The temperature is monitored via a Programmable Logic Computer (PLC). The minimum set point is 600°F. Above this temperature, 0.292 lbs VOC/1,000 gal is achievable		
Verification of Operational Status	NA	NA	NA
QA/QC Practices and Criteria	The thermocouple is factory calibrated. The thermal oxidizer maintenance schedule does not include any requirements for thermocouple calibration	NA	NA
Monitoring Frequency	Measured continuously	At least an annual inspection of the burner and periodic maintenance at a frequency in accordance with any applicable manufacturers' suggested schedule	At least an annual inspection of the burner and periodic maintenance at a frequency in accordance with any applicable manufacturers' suggested schedule
Data Collection Procedure	Recorded continuously during burner operation	Record results of maintenance procedures and annual inspection to be maintained for a 5-year period	Record results of maintenance procedures and annual inspection to be maintained for a 5-year period
Averaging Period	No average is taken	NA	NA

- 26.c. **NSPS:** The following New Source Performance Standards, 40 CFR Part 60, requirements are applicable to this facility:
- 26.c.i. Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978 (Subpart K) is applicable to this facility [INTANK: Tanks 17, 18, and 19], and all requirements have been incorporated into the permit.
  - 26.c.ii. Standards of Performance for Volatile Organic Liquid Storage Vessel (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (Subpart Kb) is applicable to this facility [INTANK: Tanks 16, 25, 40, 41, and 42] and all requirements have been incorporated into the permit.
  - 26.c.iii. Standards of Performance for Bulk Gasoline Terminals (Subpart XX) is applicable to this facility [TRACK] and all requirements have been incorporated into the permit.

26.d. **NESHAP/MACT:** The following National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, requirements are applicable to this facility:

26.d.i. Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (Subpart BBBBBB) is applicable to the facility (INTANK, EXTANK, FIXTANK, and TRACK).

40 CFR Part 63 Subpart BBBBBB citations	Description	Applicable to source (yes/no)	Comments	Permit conditions
63.11080	Purpose	Yes	Informational	NA
63.11081	Subpart applicability	Yes	Conditions (a)(1) through (a)(3) and (b) through (j) are not applicable	19, 22, 25
63.11082	Affected source	Yes	Conditions (b) and (c) are not applicable	19, 22, 25
63.11083	Compliance dates	Yes	Conditions (a) and (c) are not applicable	19, 22, 25
63.11085	General duties	Yes	There are no exemptions from this requirement.	26
63.11086	Requirements for a bulk gasoline plant	Yes	Condition (b) is not applicable.	20.a.i, 21.a, 24.a, 28, 59
63.11087	Requirements for gasoline storage tanks	Yes	There are no gasoline storage tanks at the facility exempt from this requirement.	17, 18, 19
63.11088	Requirements for gasoline loading racks	Yes	Condition (b) is not applicable.	20, 21, 22
63.11089	Requirements for equipment leak inspections	Yes	There are no exemptions from this requirement.	23, 24, 25, 58, 60
63.11092	Testing and monitoring requirements	Yes	Conditions (a)(4), (b)(1)(i), (b)(1)(iv), (b)(2), and (f)(2), are not applicable.	18.a, 21.b-g,
63.11093	Notifications requirements	Yes	There are no exemptions from this requirement.	NA
63.11094	Recordkeeping requirements	Yes	Conditions (b)(3) is not applicable.	19.a, 22.a-c, 25.a, 27.a,
63.11095	Reporting requirements	Yes	Conditions (a)(4) is not applicable.	19.b, 22.d, 22.e, 25.c, 27.b
63.11098	General provisions	Yes	Informational	NA
63.11099	Implements and enforces	Yes	Informational	NA

#### STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

27. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do to apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

#### MONITORING REQUIREMENTS

28. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the

applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit. In addition, the permit includes monitoring of operating parameters for other emission units and pollution control devices.

Facility-wide:

The facility-wide monitoring associated with the bulk gasoline terminal operations is specified in 40 CFR 63, Subpart BBBB – Gasoline Distribution Bulk Terminal, which includes monitoring and recordkeeping of the FIXTANK, INTANK, EXTANK, TRACK, and FGTVOC. The monitoring for diesel includes recordkeeping and/or sample analysis necessary to determine to sulfur content of residual and distillate oil sold or distributed to outside sources. Other facility-wide monitoring requirements include fugitive PM visual monitoring and OWS effluent flowrate monitoring, and complaint investigation as needed.

Emission unit specific monitoring:

The emission unit specific monitoring section contains six unique monitoring conditions applicable to emissions unit TRACK, EXTANK, INTANK, FIXTANK, FGTVOC, and OWS.

- TRACK: Monitoring related to the tanker truck and trailer loading racks are specified in the 40 CFR 60, Subpart XX – Standard of Performance for Bulk Gasoline Terminals by reference. The monitoring includes extensive recordkeeping requirements to ensure the gasoline delivery vessels being loaded at the terminal are tested and certified according to testing protocols of the NSPS. The periodic inspections are necessary to ensure no vapor or liquid leaks exist during product transfer, and the Vapor Recovery Unit (VRU) system is operating according to its design specifications.

- Edwards Refrigeration Unit: The Edward is tested annually which is a requirement to verify the VRU system's control efficiency. Compliance Assurance Monitoring (CAM) has also been included with this renewal as required by 40 CFR Part 64. CAM for the VRU is the monitoring and continuous recording of the temperature of the refrigeration coils in the VRU. Based upon facility to be in compliance at -68° F. The facility has therefore, proposed a maximum operating temperature, averaged over the emission control cycle, of -68° F.

**OR**

- VCU – Thermal Oxidizer: John Zink Enclosed Flare Unit: To determine compliance with the mass emission limitation of 35 milligrams of total organic compounds per liter of gasoline loader (0.292 lb VOC/1,000 gallons), the VCU will be tested within 60 days after achieving the maximum production rate at which the VCU will operate, but no later than 180 days after initial startup. The CAM Plan for the flare is the monitoring and continuous recording of the outlet temperature of the stack. Based upon

engineering specifications, a temperature of 600° F or above should demonstrate compliance. This will be verified by source testing required in the permit.

- EXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in EXTANK.
- INTANK: Monitoring related to internal floating roof tanks basically include periodic visual inspections to ensure there are no tears and deterioration of tank's covers and seals. The INTANK No. 17, 18, and 19 are subject to the NSPS Subpart K – Standard of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 monitoring, as referenced in the permit. The INTANK No.'s 16, 25, 40, and 42 (and 41 when operating with gasoline) are subject to the NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 monitoring, as referenced in the permit.
- FIXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in FIXTANK.
- FTGVOC: Monitoring related to fugitive VOC sources includes periodic sight, sound, and smell inspections of the facility.
- OWS: Monitoring related to VOC emissions includes effluent flowrate into the OWS.

#### PSEL Monitoring:

FIXTANK, INTANK, EXTANK

The EPA program TANKS 4.09d was used to estimate the VOC emission losses from the storage tanks. The program estimates emissions as either working losses or standing losses. Working losses are losses from the throughput of the fuel, which are directly tied to the maximum rate of the loading rack pumps.

Standing losses are associated with the static characteristics of the tanks such as roof type and tank volume. These emission estimates will remain unchanged throughout the life of the permit, unless the tanks are modified. When tanks are modified, the facility always upgrades the seals and/or roof type, which improve the tank and reduce losses of product.

The emission estimates thus represent the maximum potential to emit for the facility, and compliance with the PSELs is ensured and no further monitoring is required. If improved emission factors become available the PSELs will be recalculated at the time the permit is renewed.

TRACK: The VOC emissions from emission unit TRACK are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year. This is the potential to emit for the emission unit and therefore, no PSEL monitoring for the unit is required. The facility is required to track 12-month rolling barrels per year of gasoline loaded to determine compliance with the synthetic minor limitation for total HAPs. The PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO and VOC emissions from the VCU will be calculated based on lb/MMscf multiplied by emission factors for the VCU in the permit.

FGTVOC: The emissions from emission unit FGTVOC are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year and fixed number of flanges, valves, etc., that currently exist at the facility. This is the potential to emit for the emission unit and therefore, no PSEL monitoring for the unit is required.

#### **GENERAL TESTING REQUIREMENTS**

29. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may

not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

### SOURCE TEST RESULTS

30. This facility has conducted various source tests to comply with permit requirements. The table below shows the results of the test reports on file at LRAPA.

#### Edwards Refrigeration Vapor Recovery System

Emission Device	Test Date	Production Rate During The Test	Results
Edwards Refrigeration Vapor Recovery System	April 29, 2015	463,460 gallons of gasoline	0.117 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 22, 2016	490,612 gallons of gasoline	0.110 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 28, 2017	507,882 gallons of gasoline	0.112 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 27, 2018	438,174 gallons of gasoline	0.129 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 5, 2019	456,109 gallons of gasoline	0.160 lb THC*/1000 gallons of gasoline

\*THC = Total Hydrocarbons

#### VCU – Thermal Oxidizer: Enclosed Flare

31. SFPP is required to test the VCU within 60 days after achieving the maximum production rate but no later than 180 days after initial startup. The facility is required to demonstrate compliance with the mass emission limitation of 35 mg/L (0.292 lb VOC/1,000 gallons). If SFPP modifies the operating parameters, such as a lower temperature or increases the current maximum flow from EU: TRACK, the permittee must retest the VCU within 180 days.

### RECORDKEEPING REQUIREMENTS

32. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions. The records of all monitoring specified in the Title V permit must be kept at the plant site for at least 5 years.

### REPORTING REQUIREMENTS

33. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually.

### GENERAL BACKGROUND INFORMATION

34. The facility is located in an area that has been designated as attainment for particulate matter less than 10 microns (PM<sub>10</sub>) (maintenance area), ozone, carbon monoxide (maintenance area), nitrogen dioxide, sulfur dioxide, and lead.

35. The facility is located within 100 kilometers of two (2) Class-I air quality protection areas: Diamond Peak Wilderness, and Three Sisters Wilderness.

#### **COMPLIANCE HISTORY**

36. The facility is current compliant with the Title V permit.

#### **PUBLIC NOTICE**

37. This permit will be on public notice from November 22, 2019 to December 26, 2019. No comments were submitted during the comment period. No public hearing was requested by 10 or more individuals or one person representing a group of 10 or more individuals. A proposed permit will then be sent to EPA for a 45-day review period. LRAPA requested and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

If EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

#### **EPA REVIEW**

38. This proposed permit was sent to EPA on January 6, 2020, for a 45-day review period. Because no adverse comments were received and there were no substantive changes to the permit after the public comment period, LRAPA requested and EPA agree to expedited review. The public will have 105 days (45-day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.



**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)  
 CONSTRUCTION AIR CONTAMINANT DISCHARGE REVIEW REPORT**

**SFPP, L.P. – Eugene Terminal  
 1765 Prairie Road  
 Eugene, OR 97402**

**Source Information:**

SIC	4226
NAICS	424710

Source Categories (Title 37, Table 1: Part and Code)	B.31: Gasoline bulk plants, bulk terminals, and pipeline facilities
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**Compliance and Emissions Monitoring Requirements:**

Unassigned emissions	8
Emission credits	NA
Compliance schedule	NA
Source test [date(s)]	See Permit

COMS	NA
CEMS	NA
CPMS	X
Ambient monitoring	NA

**Reporting Requirements**

Annual report (due date)	March 15
Emission fee report (due date)	March 15
SACC (due date)	August 15
Quarterly report (due dates)	NA

Monthly report (due dates)	NA
Excess emissions report	Immediately
Other reports	GHG

**Air Programs**

NSPS (list subparts)	K, Kb, XX
NESHAP (list subparts)	BBBBBB
CAM	Yes
Regional Haze (RH)	NA
Synthetic Minor (SM)	Yes (HAPs)
Part 68 Risk Management	NA
Title V	Yes
ACDP (SIP)	Construction
Major HAP source	No

Federal major source	NA
NSR	NA
PSD	NA
Acid Rain	NA
Clean Air Mercury Rule (CAMR)	NA

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT**

ACDP	Air Contaminant Discharge Permit	MSF	1,000 Square feet 3/8” basis
Act	Federal Clean Air Act	MSDS	Material Safety Data Sheets
ASTM	American Society of Testing and Materials	NA	Not applicable
BER	Baseline Emission Rate	NCA	Notice of Civil Penalty
Btu	British thermal unit	NO <sub>x</sub>	Nitrogen oxides
CAM	Compliance Assurance Monitoring	NESHAP	National Emission Standard for Hazardous Air Pollutant
CEMs	Continuous emission monitoring system	NON	Notice of Non-Compliance
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
CO <sub>2</sub>	Carbon Dioxide	O <sub>2</sub>	Oxygen
CO <sub>2e</sub>	Carbon Dioxide Equivalent	OAR	Oregon Administrative Rules
CPMS	Continuous parameter monitoring system	ORS	Oregon Revised Statutes
DEQ	Department of Environmental Quality	O&M	Operation and maintenance
dscf	Dry standard cubic feet	PAH	Polycyclic Aromatic Hydrocarbon
EF	Emission factor	Pb	Lead
EPA	US Environmental Protection Agency	PCD	Pollution Control Device
ERC	Emission Reduction Credit	PM	Particulate matter
EU	Emissions Unit	PM <sub>10</sub>	Particulate matter less than 10 microns in size
F	Fahrenheit	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
FCAA	Federal Clean Air Act	POM	Polycyclic Organic Matter
FSA	Fuel sampling and analysis	ppmv	Parts per million by volume
GHG	Greenhouse Gas	ppm	Parts per million
gpm	gallons per mile	PSEL	Plant Site Emission Limit
gr/dscf	Grain per dry standard cubic foot (1 pound = 7,000 grains)	psia	pounds per square inch, actual
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RVP	Reid Vapor Pressure
HCFC	Halogenated Chloro-Fluoro-Carbons	SCAQMD	South Coast Air Quality Management District
ID	Identification number	SERP	Source emissions reduction plan
I&M	Inspection and maintenance	SPEC	Special
l	Liter	SO <sub>2</sub>	Sulfur dioxide
lb	Pound	ST	Source test
LRAPA	Lane Regional Air Protection Agency	THC	Total Hydrocarbons
mg	milligram	VCS	Vapor Control System
M	1,000	VE	Visible emissions
MM	1,000,000	VMT	Vehicle miles traveled
MB	Material Balance	VOC	Volatile organic compounds
		VCU	Vapor Combustion Unit
		VRU	Vapor Recovery Unit

## PERMITTEE IDENTIFICATION

1. Kinder Morgan’s subsidiary SFPP, L.P. – Eugene Terminal owns and operates a petroleum products distribution terminal facility located at 1765 Prairie Road in Eugene, Oregon.  
[https://www.kindermorgan.com/business/products\\_pipelines/eugene.aspx](https://www.kindermorgan.com/business/products_pipelines/eugene.aspx)

## FACILITY DESCRIPTION

2. SFPP, L.P. – Eugene Terminal (SFPP or Facility) received refined fuels from Portland via 8-inch pipeline, truck, or railcar and transfers gasoline and diesel from the storage tanks into tanker trucks via one (1) of four (4) loading racks. Denatured ethanol is stored and distributed at the Eugene facility via truck. Gasoline and diesel additives are typically received by truck.

A variety of petroleum products including gasoline, diesel, transmix, ethanol (oxygenate), and proprietary customer fuel additives are stored in aboveground storage tanks. The higher volatility products including gasoline, transmix (a combination of gasoline, diesel, and/or jet fuel), and denatured ethanol are stored in floating roof tanks (external and internal floating roofs) due to their higher vapor pressures. Less volatile products including diesel and fuel additives are stored in fixed-roof tanks and horizontal tanks, as well as the floating roof tanks.

The facility receives petroleum fuels and stores these fuels in bulk petroleum product storage tanks. Fuel products are blended with additives and oxygenates as required, and these products are distributed to tanker trucks. At the facility there are forty-one (41) bulk petroleum product storage tanks, where thirty-five (35) storage tanks are permitted and nine (9) are currently out of service. There is also a water holding tank. SFPP has tanks for storage of gasoline, diesel, and ethanol. Tank types include fixed roof, internal floating roof, and external floating roof. Emissions are comprised of working losses, rim seal losses, and deck fitting/seam losses. The equipment at the facility includes twelve (12) vertical fixed roof tanks, fifteen (15) internal floating roof tanks (including a domed external roof tank), eight (8) external floating roof tanks, an oil water separator, nine (9) (including one (1) tote) additive tanks, four (4) loading racks, one unloading rack, one prover, two (2) sumps (main line and rack sumps), and one vapor recovery unit for the loading racks.

Out of Service Tank Numbers
EG-06
EG-07
EG-21
EG-28
EG-29
EG-30
EG-31
EG-33
EG-34

Petroleum products from the tanks are dispensed to the loading racks. The loading racks consist of one or more “bays” with each bay able to accommodate one tanker truck. Each storage tank is connected via underground and aboveground pipelines to a manifold where it can be directed to one or more of the four loading racks or another storage tank. Petroleum fuels are conveyed to a given loading rack and are pumped into a customer tanker truck via one or more bottom-loading arms. No processing of incoming materials, other than blending, is performed at the facility.

Transmix is a mixture of different petroleum fuel products that forms at the interface between products conveyed together in a pipeline or generated through normal maintenance and operations activities. This mixture is

received at the terminal, stored in specified tanks, and transferred at the loading racks to trucks for offsite processing. Separation of the transmix constituents is not conducted at the facility.

**PROPOSED EQUIPMENT INSTALLATION UNDER CONSTRUCTION ACDP**

- For this proposed action to the current Title V permit for SFPP will only incorporate the regulation language that is applicable to the newly constructed Vapor Combustion Unit (VCU) for the emission unit – TRACK (EU: TRACK). Corrected the Unassigned Emissions for VOC to 8 tons per year, updated language for General Testing Requirements to current language, and updated condition references.

The installation of a new VCU that will replace the existing Vapor Recovery Unit (VRU): Edwards Refrigeration for the EU: TRACK. The new VCU system will utilize a thermal oxidizer (enclosed flare), with an 80 MMBtu/hour, four (4) burner, air-assisted, John Zink Enclosed Flare and a holding bladder that will be installed in Tank EG-07, to control the vapors recovered from the loading rack operations (EU: TRACK) and releasing the emission from the loading racks at steady rate to the VCU.

A Construction ACDP is required for the proposed installation of VCU because it will result in the addition of applicable requirements in the permit and the addition of new emitted air pollutants from the combustion of the hydrocarbon vapors. The new pollutants are PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and GHGs. The VOCs emissions will remain the same as the current permit. The facility requested a limit of 39 tons of NO<sub>x</sub> to remain below the significant emission rate (SER) and therefore, not triggering a State Type A permit review.

The C-ACDP does not allow for the operation of the proposed VCU and associated equipment but the requirements may be rolled into the Title V operating permit as an Administrative Amendment as long as the appropriate notice procedures are followed in accordance with the Title V rules. The operation will need to be in compliance with the Title V operating permit that is in affect at the time of start-up.

The permittee has requested the external review procedures in OAR 340-218-0210 and 340-218-0230 in addition to the usual public notice procedures, be followed in order to all this C-ACDP to be incorporated into the Title V operating permit by an administrative amendment. [LRAPA 37-002(5)(b)]

This C-ACDP will not address any changes in State or Federal regulations which are applicable to the facility. Nor will it make any changes to any existing Title V operating permit conditions at this time. Any required changes in permitted operating conditions will be made when the Title V operating permit is renewed.

**EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION**

- The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
All fixed-roof storage tanks at the facility with a rated capacity great than 39,000 gallons	FIXTANK	None	NA
All internal floating-roof storage tanks at the facility	INTANK	None	NA
All external floating-tanks at the facility	EXTANK	None	NA
Tanker truck and trailer Loading Racks 1, 2, 3, and 4 including fugitives and Unloading Rack 5	TRACK	Vapor Recovery Unit: (Refrigeration Type) OR Vapor Combustion Unit: (Thermal Oxidizer Type)	VRU or VCU

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
VOC emissions from Flanges, Valves, Pumps, etc. at the Terminal	FGTVOC	None	NA
Water/Oil Separator	OWS	None	NA
Aggregate Insignificant Activities: Ethanol Offloading Product Unloading Prover Additive Tanks	AI	None	NA

5. **FIXTANK – Fixed Roof Storage Tanks:** This emission units represents all the fixed roof storage tanks existing at the permitted facility. This type of tank generally consists of a cylindrical steel shell with a permanently affixed roof, which may vary in design from cone (or dome-shaped) to flat. The Eugene Terminal houses a total of twelve (12) fixed roof storage tanks, all of which have a capacity of more than 39,000 gallons. All fixed roof storage tanks currently store volatile liquids with a vapor pressure less than 0.022 psia. Fixed roof storage tank VOC emission are the sum of breathing losses and working losses, which are a function of physical/chemical properties of materials being stored at stored condition, as well as, the physical design of tank itself. This holds true for all types of storage tanks, including EXTANK and INTANK described below.
  
6. **EXTANK – External Floating Roof Storage Tanks:** This emission unit represents all external floating roof storage tanks existing at the terminal. There are eight (8) external floating roof tanks existing at the facility, with capacity ranging from 252,000 to 840,000 gallons. All EXTANK were installed on or before 1984. This type of tank generally consists of a cylindrical shell with an external floating roof that moves with respect to the stored liquid level.
  
7. **INTANK – Internal Floating Roof Storage Tanks:** This emissions unit represents all the internal floating roof storage tanks existing at the permitted facility. The emission unit has both a permanent fixed cone roof and a floating deck inside, which is free to move vertically as the liquid level rises and falls, and either floats on the liquid surface or rests on pontoons several inches above the liquid surface. The facility has a total of fourteen (14) internal floating roof tanks and one (1) domed internal floating roof tank. According to the permit application, there are three (3) internal floating roof tanks, (tanks 17, 18, and 19) constructed in 1973 that are subject to the NSPS requirements of 40 CFR Part 60, Subpart K. There are five (5) internal floating roof tanks (16, 25, 40, 41, and 42) constructed or modified after the year 1984 that are subject to the NSPS requirements of 40 CFR 60, Subpart Kb. Tanks 16 and 25 were modified in 2007/2008 as part of the B07 construction project to increase ethanol offloading and became subject to the NSPS requirements of 40 CFR 60, Subpart Kb. The project involved adding a nozzle on both Tank 16 and 25 that increased the hourly potential to emit of VOC.
  
8. **TRACK – Tanker Truck/Trailer Loading and Unloading Racks:** The emission unit represents the tank truck loading and unloading racks used to distribute various petroleum products. There are a total of four (4) loading racks at the facility with multiple fill positions at each rack. Rack four (4) was constructed in 1984, after the NSPS trigger date along with the vapor recovery unit. There is one (1) unloading rack used to offload ethanol from trucks; rack five (5) was constructed in 2008 to increase ethanol capacity. The affected facility for applicability of NSPS requirements of 40 CFR Part 60, Subpart XX is the total of all loading racks. An analysis of whether reconstruction or modification occurred was not presented. However, for ease of compliance, the facility has chosen to assume that all the loading racks in TRACK are subject to the Subpart XX requirements. With the exception of Rack 5 is for product unloading only and is therefore, not subject to the Subpart XX requirements for loading racks. Both loading racks number 1 and 2 have red-dye injectors for diesel fuel.
  - 8.a. **Existing: Vapor Recovery Unit (VRU):** This is a refrigeration type vapor recovery unit that controls fuel vapors from the loading racks. The VRU is an Edwards Engineering, Inc. model, rated at 93.5% recovery efficiency. The VRU is designed to process a gasoline pumping rate of 2,400 gpm at 35 mg of hydrocarbon per liter. The gases from the loading rack hoses are captured and piped to the VRU.

Vapors go to one of two refrigeration units and enter a pre-cooler, cooling vapors between 25- and 50-degrees Fahrenheit. Condensed vapors drain into a decanter while remaining vapors continue to a two-section compartment of the refrigeration unit. The first section cools the condensed vapors to between 0 and -40° F and the second section to between -80 and -90° F. During normal operations the condenser unit cools the vapors to -68° F. The condensed vapors also drain to the decanter and are pumped back to storage. One of the two (2) refrigeration units defrosts several times per day by heating D-Limonene and pumping it through the refrigeration coils to melt any ice buildup.

**Proposed: Vapor Combustion Unit (VCU – Thermal Oxidizer (enclosed flare)):** The VCU is a thermal oxidizer type vapor combustion unit that will control the hydrocarbon vapors from the loading racks. The proposed VCU is a John Zink, 80 MMBtu/hour, 4 burner, air-assisted, temperature controlled enclosed flare that will meet the mass emission limitation of 35 mg/L (0.292 lbs VOC/1,000 gallon). The designed inlet gas flow rate is 1,000 cfm. Tank EG-07 will be converted to a vapor holding tank to hold a vapor bladder. The vapor holder tank will be equipped with alarms to prevent product loading from exceeding capacity of the vapor bladder. The collected vapors will be sent to the VCU for combustion.

9. **FGTVOC – Fugitive VOC emitting sources:** The emissions unit FGTVOG represents fugitive VOC emissions associated with VOC product handling. The pipe transport systems contain numerous valves, flanges, pumps, sampling ports, and other components through which VOC vapors escape. For the purpose of estimating VOC emissions, emissions factors published in EPA’s *Protocol for Equipment Leaks Emission Estimates, US Environmental Protection Agency, Office of Air Quality Planning and Standards, EPA-453/R-95-017, November 1995*, are used. Unless actual emission factors are available for use in the VOC emission calculations, the emission factors as listed in the Title V permit monitoring section should be used. The table below lists the number of each component currently existing at the facility:

Component “i”	Number of Component “i”
Fittings (connectors and flanges)	365
Other (compressors and others)	236
Pumps	94
Valves	1,241

10. **OWS – Oil/Water Separator:** The facility storm drains (containing potentially contaminated rainwater/contact water (effluent) are routed to an enclosed vault and then to the Oil/Water Separators. The water from the OWS is then routed to a holding pond which is periodically pumped through an onsite carbon adsorption system when sufficient quantity builds up. It is then discharged to the City of Eugene storm water drainage ditch. The flowrate depends on rainfall and varies throughout the year. The flowrate depends on rainfall and varies throughout the year.

The VOC emissions from the two OWS were calculated using the emission factor for oil/water separators in Table 5.1-2 of Section 5.1 (Petroleum Refining), *EPA’s AP-42 Compilation of Air Pollutant Emission Factors, January 1995*. This emission factor is 5 lbs/1000 gallons.

The OWS was placed on the emission units list because it no longer qualifies as a categorically insignificant activity per the DEQ amended Oregon Administrative Rules effective April 16, 2015. The OWS with effluent greater than 400,000 gallons per year are considered an emission unit.

11. **Aggregate Insignificant (EU-AI):** Aggregate Insignificant Activities include emissions described below:

Emissions Source	VOC (ton/yr)
Product Unloading	0.305
Ethanol Offloading	0.31
Prover	0.053
Additive Tanks	0.060
<b>Total</b>	<b>0.728</b>

12. Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, gasoline, natural gas, or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant;
  - Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;
  - Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour.
- Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pump, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL.
- Office activities
- Janitorial activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Electrical charging station
- Fire Brigade Training
- Fire suppression
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids

- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads, except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Combustion source flame safety purging on startup

As part of the 2015 renewal, potential emission from the following Categorical Insignificant Activities were estimated by the facility to be:

Emissions Source	VOC (ton/yr)
Sumps	2.45
Vault	5.00
Holding Pond	6.57
<b>Total</b>	<b>14.02</b>

## OPERATING SCENARIO

13. The facility has a single operating scenario.

## EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

14. The following sections describe each applicable requirement in the permit, with the intent of the condition and a brief discussion of any unique features of the requirements.
- 14.a. Conditions 1 includes requirements and information related to the Construction ACDP.
  - 14.b. Conditions 2-7 are the requirements for the installation of the VCU and the incorporating the VCU conditions into the Title V operating permit.
  - 14.c. Conditions 8 is a general statement about the enforceability of permit conditions which are required in and common to all Title V permits issued by LRAPA.
  - 14.d. Condition 9 provides a list of equipment and identification of pollution control devices for the facility.
  - 14.e. Condition 10 and 11 is a facility-wide fugitive dust control requirement that allows the permittee to deal with potential fugitive dust problems before they become standard violations. The reasonable precautions can be required without the need to show a violation. (e.g., dust from traffic on roads).
  - 14.f. Condition 12 implements the sulfur limits by grade of fuel type provision in LRAPA rules.
  - 14.g. Condition 13 describes the required monitoring and recordkeeping to track sulfur limits per fuel type that the facility distributes per Condition 12.

- 14.h. Condition 14 is a facility-wide nuisance resolution condition that establishes timely response to any complaints that the facility operation may generate.
- 14.i. Condition 15 implements the long-standing particulate matter fallout provision in LRAPA rules. The monitoring and recordkeeping refer back to the periodic visible emission surveys required in Condition 14.a.
- 14.j. Condition 16 is a standard requirement for Title V facilities stating the permittee's responsibility for 40 CFR 68 accidental release provisions should the facility trigger this requirement.
- 14.k. Condition 17-28 lists the Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facility NESHAP requirements from 40 CFR 63 Subpart BBBBBB that applies facility-wide.
- 14.l. Condition 29 lists the annual Plant Site Emission Limits (PSELs) for the facility.
- 14.m. Condition 30 and 31 contains specific notification requirements per 40 CFR 60.7 for EUs: FIXTANK.
- 14.n. Condition 32 and 33 lists the Storage Vessels for Petroleum Liquids NSPS requirements from 40 CFR 60 Subpart K that applies to EU: INTANK, Tanks 17, 18, and 19.
- 14.o. Conditions 34-36 lists the Volatile Organic Liquid Storage Vessels NSPS requirements from 40 CFR 60 Subpart Kb that applies to EU: INTANK, Tanks 16, 25, 40, 41, and 42.
- 14.p. Conditions 37-39 contains the Bulk Gasoline Terminals NSPS requirements from 40 CFR 60 Subpart XX that applies to EU: TRACK.
- 14.q. Conditions 40-42 contains the CAM monitoring requirement for the VRU and VCU for EU: TRACK.
- 14.r. Conditions 43-51 contains local regulations of applicability, monitoring, testing, recordkeeping and reporting that pertain to the Vapor Combustion Unit (VCU) – Thermal Oxidizer (Enclose Flare) for the EU: TRACK.
- 14.s. Conditions 52-54 contains the NSPS and NESHAP monitoring and recordkeeping requirements for EU: FGTVOG.
- 14.t. Condition 55 contains the particulate matter grain loading and opacity limitations that apply to the Insignificant Emission Units or Activities (IEU).
- 14.u. Condition 56 specifies that no testing is required for IEU but, if tested, requires testing be completed in accordance with standard testing requirements.
- 14.v. Condition 57 lists the emission fees based on the PSEL component for each emission unit.
- 14.w. Condition 58 contains the general testing requirements.
- 14.x. Conditions 59-61 contains the general monitoring requirements for the facility.
- 14.y. Conditions 62-65 contains the general recordkeeping requirements for the facility.
- 14.z. Conditions 66-70 contains the general reporting requirements for the facility.
- 14.aa. Condition 71-73 lists the semi-annual and annual report requirements for the facility.
- 14.bb. Condition 74 specifies the non-applicable requirements that could reasonably be considered to apply to the facility.

#### **EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES**

- 15. As identified earlier in this Review Report, this facility has insignificant emissions units (AI) that include categorically insignificant activities and aggregate insignificant emissions, as defined in LRAPA Title 12 and/or OAR 340-200-0020. For the most part, the standards that apply to AI are for opacity (20% limit) and particulate matter (0.10 gr/dscf limit). LRAPA does not consider it likely that AI could exceed an applicable emissions limit or standard because AI are generally equipment or activities that do not have any emission controls (e.g., small natural gas-fired space heaters) and do not typically have visible emissions. Since there are no controls, no

visible emissions, and the emission are less than one (1) ton per year, LRAPA does not believe that monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

**PLANT SITE EMISSION LIMITS**

16. Provided below is a summary of the baseline emission rate, netting basis, plant site emission limit and emissions capacity.

Pollutant	Baseline (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			PTE (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)	
PM	0	0	0	0	24	24	3
PM <sub>10</sub>	0	0	0	0	14	14	3
PM <sub>2.5</sub>	NA	NA	0	NA	9	9	3
CO	0	0	0	0	99	99	12
NO <sub>x</sub>	0	0	0	0	39	39	44
SO <sub>2</sub>	0	0	0	0	0	0	0.20
VOC	480	480	480	472	472	0	472
Single HAP	0	0	0	9	9	9	9
Total HAP	0	0	0	24	24	0	24
Pb	0	0	0	0	0	0	0
GHG	0	0	0	0	74,000	74,000	45,520

17. A baseline emission rate was not required for PM<sub>2.5</sub> in accordance with the definition of “baseline emission rate” in LRAPA Title 12.
18. The baseline emission rate for greenhouse gases (GHGs) are zero (0) because the facility did not operate any source that emitted GHGs between the baseline period of calendar years of 2000-2010.
19. The PSEL for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and NO<sub>x</sub> were installed into the table for the proposed combustion emission for the VCU.
20. There is no change to the netting basis for the pollutants with newly-established PSELs (PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and NO<sub>x</sub>). Increases to the netting basis is approved through Major NSR, Type A State NSR, or PSD action under title 38. The pollutants with newly-established PSELs are below the SER and therefore, the action did not trigger a Major NSR or Type A State NSR action, so the netting basis for each of these pollutants remains zero (0). [LRAPA 42-0046(3)(e)]
21. Baseline emissions rate (BER) for VOC is based on 1984 actual emissions for the facility. Emissions from 1977-78 were reportedly unavailable. At the time of the permit application submittal of 2000, SFPP reportedly defended its use of 1984 data by stating that emissions had decreased from the 1977-78 period. Emission reduction projects implemented in that time period were tank and tank seal improvements, and elimination of top-loading of tanker trucks. Uncontrolled splash loading of gasoline, a major contributor to emissions, continued through the end of 1984. In 1984, the applicant installed a vapor collection system (VCS) in accordance with the 40 CFR 60 Subpart XX. The significant emission reduction is required by rule and must be discounted from the netting VOC BER (i.e., it cannot be used for credits or internal offsets). The netting BER for VOC for this facility was reset to present emission levels to account for VRU. The calculations use TANKS 3.1 methodology to estimate emissions from the storage tanks. Estimated loading emissions prior to installation of the VCS are 1,778 tons per year. The total throughput in 1984 was 368,299,974 gallons per year.

Baseline Changes for 2008 Title V permit: The facility requested a change in the baseline emissions to reflect better information with the renewal application received in 2005. The previous baseline emissions estimations did not account for fugitive emissions at the loading racks. The addition of the rack fugitives, which had been present in the baseline year but not accounted for, changed the total baseline emission rate for VOC for 418.6 to 480 tons per year. Unassigned Emissions in the amount of 1.6 tons per year. Are based on voluntary “out of service” commitment for emission units EXTANKS – Tanks 21, 27, 28, 29, 31, 33, and 34.

Other Baseline Changes: PM and PM<sub>10</sub> for paved roads (Emission Unit FGTPM) was removed from the baseline emission rate and PSEL as part of the 2007 renewal because fugitive particulate matter from paved roads is specifically identified as a categorically insignificant activity (CIA) in the Oregon Title V rules. The Oil/Water Separator was taken off the Categorically Insignificant Activities (CIA) list and added to the emission units list per amended Oregon Administrative Rules effective April 16, 2015.

**UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS**

- 22. The facility has eight tons (8 tons) of VOC as unassigned emissions. The facility does not have any emission reduction credits at this time.

**SIGNIFICANT EMISSION RATE**

- 23. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 12 for all of the pollutants as shown below:

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Unassigned Emissions (tons/year)	SER (tons/year)
PM	---	24	---	25
PM <sub>10</sub>	---	14	---	15
PM <sub>2.5</sub>	---	9	---	10
CO	---	99	---	100
NO <sub>x</sub>	---	39	---	40
SO <sub>2</sub>	---	---	---	40
VOC	480	472	8	40
Pb	---	---	---	0.06
GHG	---	74,000	---	75,000

- 24. There have been no physical modifications at the facility that would have required a New Source Review or have met the LRAPA definition of a major modification since the baseline period. Previously insignificant emission units or activities were incorporated into this renewal permit because it was determined through calculations that they should be accounted for as emission units.

**HAZARDOUS AIR POLLUTANTS**

- 25. The following is the potential to emit (tons per year) of the facility for hazardous air pollutants listed in Section 112(b) of the 1990 Clean Air Act Amendments (CAAA). The emissions totals below reflect the maximum HAP emissions from the facility. The table demonstrates that the facility emits less than ten (10) tons per year of any single HAP and less than 25 tons per year of total HAPs. SFPP is considered an area source of HAP and is subject to 40 CFR 63 Subpart BBBB.

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Hexane	7.9
Benzene	4.1

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Toluene	5.8
2,2,4-Trimethylpentane	3.6
Xylene	2.3
Ethyl Benzene	0.5
POM as 16-PAH (Naphthalene)	0.2
<b>Total</b>	<b>24.4</b>

**FEDERAL REQUIREMENTS**

26. The applicability of various federal requirements is as follows:

26.a. **Accidental Release:** The source has certified that the facility is not subject to 40 CFR Part 68, which requires a risk management plan for toxic and flammable substances releases.

26.b. **Compliance Assurance Monitoring (CAM):** The CAM rule, 40 CFR Part 40, applies to emission unit: TRACK. Compliance Assurance Monitoring for this unit is as follows:

26.b.i. VRU: Edwards Refrigeration Unit: The temperature will be continuously recorded of the refrigeration coils in the VRU. Whenever the TRACK is in operation. The facility is required to take corrective action if the temperature exceeds above -68° Fahrenheit, averaged over the emission control cycle. Records must be maintained of temperatures, maintenance, excursions, and excess emissions and corrective actions taken.

26.b.ii. VCU: John Zink Enclosed Flare: The Compliance Assurance Monitoring (CAM) Plan for the Vapor Combustion Unit – thermal oxidizer – enclosed flare (VRU), was develop in accordance with 40 CFR Section 64.3, “Monitoring design criteria”. The collected vapors from EU: TRACK will be routed to a vapor holding tank (Tank EG-07). When the vapor tank bladder reaches an approximate height of 18 feet, the vapors will be released to the VCU. The parameter to be monitored will be the exhaust stack temperature and is performed continuously with a thermocouple. Periodic inspection and maintenance of the burner system will also be another element of the requirement of this section.

40 CFR 64: CAM has been evaluated for the facility’s installation of a new VCU – Thermal Oxidizer: Enclosed Flare

Pollutant	Does the EU: TRACK emit over 100 tons of the pollutant per year	Does the EU: TRACK have a Control Device for this Pollutant	Is there an Emission Limitation or Standard for this Pollutant	Is EU: TRACK Subject to CAM for the Pollutant
PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , and SO <sub>2</sub>	No	No	No	No
VOC	Yes	Yes	Yes	Yes

The inspection and maintenance work practice comprised of an annual inspection (including tuning) of the VCU burners was selected because this verifies equipment integrity and periodic tuning will maintain proper burner operation and efficiency. The thermocouple will be located in the stack and the temperature will be monitored via a Programmable Logic Computer (PLC). The PLC employs temperature-controlled feedback that maintains the desired temperature to

combust the VOC emissions from the EU: TRACK efficiently and with compliance with the mass emission limit.

The rationale for selection of performance indicators: The temperature was selected as a performance indicator because it is indicative of proper flare operation (combustion occurring within the chamber). If the temperature decreased below a specified set point, in this case 600°F, complete combustion may not occur. This potentially could cause the mass emission limitation of 35 mg/l (0.292 lb VOC/1,000 gallons) to be exceeded. The proper temperature operation will achieve compliance with the emission limitation. The work practice of inspecting and maintenance on an annual basis, which would include the tuning of the burners will be utilized because it verifies equipment's integrity and periodic tuning will maintain proper burner operation and efficiency. The facility will follow the manufacturer's suggested maintenance practices as applicable which further ensure reliable operation. The annual inspection of the vapor system according to the manufacturer's suggested maintenance practices as applicable will be followed to ensure reliable operation.

Per 40 CFR 64.7(d): (1) The response to excursions or exceedances, the facility will restore operation to its normal or usual manner as expeditiously as practicable. The response will include taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance. Such actions may include initial inspection and evaluation, recording the operations returned to normal without operator action, or necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (2) Determination of whether the facility has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. Based on the determination made under 40 CFR 61.7(d)(2), the Administrator may require SFPP to develop and implement a Quality Improvement Plan (QIP).

General Criteria	Indicator #1	Indicator #2	Indicator #3
Parameter	Exhaust Stack Temperature	Work Practice – Inspection and Maintenance	Work Practice – Inspection and Maintenance
Measurement Approach	Monitored continuously with a thermocouple	Periodic inspection and maintenance of the burner	Periodic inspection and maintenance of the vapor compressor
Indicator Range	At or above 600° F	Annual inspection and manufacturer's recommended maintenance frequency.	Annual inspection and manufacturer's recommended maintenance frequency.
<b>Performance Criteria</b>			
Data Representativeness	The thermocouple will be located 20' up the stack, or approximately 16.5' above the burner tips. The minimum tolerance of the thermocouple will be determined once a manufacturer is selected.	NA	NA

General Criteria	Indicator #1	Indicator #2	Indicator #3
	The temperature is monitored via a Programmable Logic Computer (PLC). The minimum set point is 600°F. Above this temperature, 0.292 lbs VOC/1,000 gal is achievable		
Verification of Operational Status	NA	NA	NA
QA/QC Practices and Criteria	The thermocouple is factory calibrated. The thermal oxidizer maintenance schedule does not include any requirements for thermocouple calibration	NA	NA
Monitoring Frequency	Measured continuously	At least an annual inspection of the burner and periodic maintenance at a frequency in accordance with any applicable manufacturers' suggested schedule	At least an annual inspection of the burner and periodic maintenance at a frequency in accordance with any applicable manufacturers' suggested schedule
Data Collection Procedure	Recorded continuously during burner operation	Record results of maintenance procedures and annual inspection to be maintained for a 5-year period	Record results of maintenance procedures and annual inspection to be maintained for a 5-year period
Averaging Period	No average is taken	NA	NA

26.c. **NSPS:** The following New Source Performance Standards, 40 CFR Part 60, requirements are applicable to this facility:

26.c.i. Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978 (Subpart K) is applicable to this facility [INTANK: Tanks 17, 18, and 19], and all requirements have been incorporated into the permit.

26.c.ii. Standards of Performance for Volatile Organic Liquid Storage Vessel (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (Subpart Kb) is applicable to this facility [INTANK: Tanks 16, 25, 40, 41, and 42] and all requirements have been incorporated into the permit.

26.c.iii. Standards of Performance for Bulk Gasoline Terminals (Subpart XX) is applicable to this facility [TRACK] and all requirements have been incorporated into the permit.

26.d. **NESHAP/MACT:** The following National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, requirements are applicable to this facility:

26.d.i. Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (Subpart BBBBBB) is applicable to the facility (INTANK, EXTANK, FIXTANK, and TRACK).

40 CFR Part 63 Subpart BBBBBB citations	Description	Applicable to source (yes/no)	Comments	Permit conditions
63.11080	Purpose	Yes	Informational	NA
63.11081	Subpart applicability	Yes	Conditions (a)(1) through (a)(3) and (b) through (j) are not applicable	19, 22, 25
63.11082	Affected source	Yes	Conditions (b) and (c) are not applicable	19, 22, 25
63.11083	Compliance dates	Yes	Conditions (a) and (c) are not applicable	19, 22, 25
63.11085	General duties	Yes	There are no exemptions from this requirement.	26
63.11086	Requirements for a bulk gasoline plant	Yes	Condition (b) is not applicable.	20.a.i, 21.a, 24.a, 28, 59
63.11087	Requirements for gasoline storage tanks	Yes	There are no gasoline storage tanks at the facility exempt from this requirement.	17, 18, 19
63.11088	Requirements for gasoline loading racks	Yes	Condition (b) is not applicable.	20, 21, 22
63.11089	Requirements for equipment leak inspections	Yes	There are no exemptions from this requirement.	23, 24, 25, 58, 60
63.11092	Testing and monitoring requirements	Yes	Conditions (a)(4), (b)(1)(i), (b)(1)(iv), (b)(2), and (f)(2), are not applicable.	18.a, 21.b-g,
63.11093	Notifications requirements	Yes	There are no exemptions from this requirement.	NA
63.11094	Recordkeeping requirements	Yes	Conditions (b)(3) is not applicable.	19.a, 22.a-c, 25.a, 27.a,
63.11095	Reporting requirements	Yes	Conditions (a)(4) is not applicable.	19.b, 22.d, 22.e, 25.c, 27.b
63.11098	General provisions	Yes	Informational	NA
63.11099	Implements and enforces	Yes	Informational	NA

#### STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

27. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do to apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

#### MONITORING REQUIREMENTS

28. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the

applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit. In addition, the permit includes monitoring of operating parameters for other emission units and pollution control devices.

Facility-wide:

The facility-wide monitoring associated with the bulk gasoline terminal operations is specified in 40 CFR 63, Subpart BBBB – Gasoline Distribution Bulk Terminal, which includes monitoring and recordkeeping of the FIXTANK, INTANK, EXTANK, TRACK, and FGTVOC. The monitoring for diesel includes recordkeeping and/or sample analysis necessary to determine to sulfur content of residual and distillate oil sold or distributed to outside sources. Other facility-wide monitoring requirements include fugitive PM visual monitoring and OWS effluent flowrate monitoring, and complaint investigation as needed.

Emission unit specific monitoring:

The emission unit specific monitoring section contains six unique monitoring conditions applicable to emissions unit TRACK, EXTANK, INTANK, FIXTANK, FGTVOC, and OWS.

- TRACK: Monitoring related to the tanker truck and trailer loading racks are specified in the 40 CFR 60, Subpart XX – Standard of Performance for Bulk Gasoline Terminals by reference. The monitoring includes extensive recordkeeping requirements to ensure the gasoline delivery vessels being loaded at the terminal are tested and certified according to testing protocols of the NSPS. The periodic inspections are necessary to ensure no vapor or liquid leaks exist during product transfer, and the Vapor Recovery Unit (VRU) system is operating according to its design specifications.

- Edwards Refrigeration Unit: The Edward is tested annually which is a requirement to verify the VRU system's control efficiency. Compliance Assurance Monitoring (CAM) has also been included with this renewal as required by 40 CFR Part 64. CAM for the VRU is the monitoring and continuous recording of the temperature of the refrigeration coils in the VRU. Based upon facility to be in compliance at -68° F. The facility has therefore, proposed a maximum operating temperature, averaged over the emission control cycle, of -68° F.

**OR**

- VCU – Thermal Oxidizer: John Zink Enclosed Flare Unit: To determine compliance with the mass emission limitation of 35 milligrams of total organic compounds per liter of gasoline loader (0.292 lb VOC/1,000 gallons), the VCU will be tested within 60 days after achieving the maximum production rate at which the VCU will operate, but no later than 180 days after initial startup. The CAM Plan for the flare is the monitoring and continuous recording of the outlet temperature of the stack. Based upon

engineering specifications, a temperature of 600° F or above should demonstrate compliance. This will be verified by source testing required in the permit.

- EXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in EXTANK.
- INTANK: Monitoring related to internal floating roof tanks basically include periodic visual inspections to ensure there are no tears and deterioration of tank's covers and seals. The INTANK No. 17, 18, and 19 are subject to the NSPS Subpart K – Standard of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 monitoring, as referenced in the permit. The INTANK No.'s 16, 25, 40, and 42 (and 41 when operating with gasoline) are subject to the NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 monitoring, as referenced in the permit.
- FIXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in FIXTANK.
- FTGVOC: Monitoring related to fugitive VOC sources includes periodic sight, sound, and smell inspections of the facility.
- OWS: Monitoring related to VOC emissions includes effluent flowrate into the OWS.

#### PSEL Monitoring:

FIXTANK, INTANK, EXTANK

The EPA program TANKS 4.09d was used to estimate the VOC emission losses from the storage tanks. The program estimates emissions as either working losses or standing losses. Working losses are losses from the throughput of the fuel, which are directly tied to the maximum rate of the loading rack pumps.

Standing losses are associated with the static characteristics of the tanks such as roof type and tank volume. These emission estimates will remain unchanged throughout the life of the permit, unless the tanks are modified. When tanks are modified, the facility always upgrades the seals and/or roof type, which improve the tank and reduce losses of product.

The emission estimates thus represent the maximum potential to emit for the facility, and compliance with the PSELs is ensured and no further monitoring is required. If improved emission factors become available the PSELs will be recalculated at the time the permit is renewed.

TRACK: The VOC emissions from emission unit TRACK are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year. This is the potential to emit for the emission unit and therefore, no PSEL monitoring for the unit is required. The facility is required to track 12-month rolling barrels per year of gasoline loaded to determine compliance with the synthetic minor limitation for total HAPs. The PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO and VOC emissions from the VCU will be calculated based on lb/MMscf multiplied by emission factors for the VCU in the permit.

FGTVOC: The emissions from emission unit FGTVOC are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year and fixed number of flanges, valves, etc., that currently exist at the facility. This is the potential to emit for the emission unit and therefore, no PSEL monitoring for the unit is required.

#### **GENERAL TESTING REQUIREMENTS**

29. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may

not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

**SOURCE TEST RESULTS**

- 30. This facility has conducted various source tests to comply with permit requirements. The table below shows the results of the test reports on file at LRAPA.

**Edwards Refrigeration Vapor Recovery System**

Emission Device	Test Date	Production Rate During The Test	Results
Edwards Refrigeration Vapor Recovery System	April 29, 2015	463,460 gallons of gasoline	0.117 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 22, 2016	490,612 gallons of gasoline	0.110 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 28, 2017	507,882 gallons of gasoline	0.112 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 27, 2018	438,174 gallons of gasoline	0.129 lb THC*/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 5, 2019	456,109 gallons of gasoline	0.160 lb THC*/1000 gallons of gasoline

\*THC = Total Hydrocarbons

VCU – Thermal Oxidizer: Enclosed Flare

- 31. SFPP is required to test the VCU within 60 days after achieving the maximum production rate but no later than 180 days after initial startup. The facility is required to demonstrate compliance with the mass emission limitation of 35 mg/L (0.292 lb VOC/1,000 gallons). If SFPP modifies the operating parameters, such as a lower temperature or increases the current maximum flow from EU: TRACK, the permittee must retest the VCU within 180 days.

**RECORDKEEPING REQUIREMENTS**

- 32. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions. The records of all monitoring specified in the Title V permit must be kept at the plant site for at least 5 years.

**REPORTING REQUIREMENTS**

- 33. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually.

**GENERAL BACKGROUND INFORMATION**

- 34. The facility is located in an area that has been designated as attainment for particulate matter less than 10 microns (PM<sub>10</sub>) (maintenance area), ozone, carbon monoxide (maintenance area), nitrogen dioxide, sulfur dioxide, and lead.

35. The facility is located within 100 kilometers of two (2) Class-I air quality protection areas: Diamond Peak Wilderness, and Three Sisters Wilderness.

#### **COMPLIANCE HISTORY**

36. The facility is current compliant with the Title V permit.

#### **PUBLIC NOTICE**

37. This permit will be on public notice from November 22, 2019 to December 26, 2019. No comments were submitted during the comment period. No public hearing was requested by 10 or more individuals or one person representing a group of 10 or more individuals. A proposed permit will then be sent to EPA for a 45-day review period. LRAPA requested and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

If EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

#### **EPA REVIEW**

38. This proposed permit was sent to EPA on January 6, 2020, for a 45-day review period. Because no adverse comments were received and there were no substantive changes to the permit after the public comment period, LRAPA requested and EPA agree to expedited review. The public will have 105 days (45-day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.

BAE/CMW  
1/7/2020

