AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-003-0309

COMPANY: Kinder Morgan Liquids Terminals, LLC

LOCATION: 801 East Ordnance Road
Baltimore, MD 21226

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
AIR QUALITY PERMITS PROGRAM

TITLE V – PART 70 OPERATING PERMIT PROGRAM OVERVIEW

Title V of the Clean Air Act (amended) requires each state to implement a federally enforceable operating permit program for major sources of air pollution. This program, the Part 70 Permit Program, also known as the Title V Permit Program, is designed to provide a comprehensive administrative document (a Part 70 Operating Permit) that identifies all air emissions sources at a given facility and the federal air quality regulations applicable to those sources. The permit establishes the methodology by which the owner/operator will demonstrate compliance, and includes testing, monitoring, record-keeping, and reporting requirements for each emissions source.

A Part 70 Operating Permit does not authorize new construction, and does not add any new emissions limitations, standards, or work practices on an affected facility. There may, however, be additional testing, record keeping, monitoring, and reporting requirements. A Part 70 Operating Permit is a five-year renewable permit. A responsible official for each facility subject to a Part 70 Operating Permit is required to annually certify compliance with each applicable requirement for that facility.

When an application for a Part 70 Operating Permit is received, the Department will complete a technical review of the application and will prepare a draft Part 70 Operating Permit and Fact Sheet. The Fact Sheet will explain the basis and technical analysis used by the Department to develop the federally enforceable permit conditions, including the required testing, monitoring, record keeping, and reporting provisions for each emissions unit at the permitted facility. The Fact Sheet will also include a description of the facility operations and the current compliance status with applicable requirements. If there are any discrepancies between the Part 70 Operating Permit application and the draft permit, the Fact Sheet will contain a discussion of the inconsistencies and the final resolution.

Public Participation Process

The Part 70 Operating Permit Program provides the public, adjacent states, and EPA the opportunity to review and submit comments on draft permits. The public may also request a public hearing on the draft permit.

The purpose of a public hearing is to give interested parties the opportunity to submit comments for the record which are germane to the draft federally enforceable permit conditions. Comments made at the hearing, or in writing to the Department during the comment period, should address errors and deficiencies in the permit such as unidentified emissions units, incorrect or deficient regulation citation, deficient record keeping, monitoring, reporting or testing requirements and unresolved compliance issues. After the public comment period has closed, the Department will review the formal testimony as part of the final review and prepare a Response to Comments document which will be sent to the EPA along with the draft Part 70 Operating Permit and Fact Sheet.

Testimony on state-only requirements will be kept on file at the Department as part of the formal record, however, state-only rules and regulations are not federally enforceable, and therefore are not within the scope of the EPA review. The Department will keep a record of the identity of the commenters, their statements, a summary of the issues raised during the public comment period, and the Response to Comments document for at least five years.

Citizen Petition to EPA to Object to Permit Issuance

Interested parties may petition the EPA to object to the Part 70 Permit if the EPA has not already objected, within 60 days after the 45-day EPA review period has ended. The petition period will be posted on the EPA website. The EPA will only consider objections to the federally enforceable provisions of the draft permit which were raised with reasonable specificity during the public comment period, unless: (1) the petitioner demonstrates that it was impractical to raise the objections within the public comment period, or (2) the grounds for the objection arose after the comment period. If the EPA agrees with the petition, the Department will reopen, revise, or revoke the permit as determined.

Applicant Objection to Permit Issuance and Recourse

If the applicant objects to the federally enforceable permit conditions contained in the issued Part 70 Operating Permit, the applicant has 15 days from receipt of the issued permit to request a contested case hearing. More information on that can be found in 40 CFR, Part 70, and COMAR 26.11.03.11.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION

NOTICE OF INTENT TO ISSUE PART 70 OPERATING PERMIT, OPPORTUNITY TO SUBMIT WRITTEN COMMENTS OR TO REQUEST A PUBLIC HEARING

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a renewal Part 70 Operating Permit submitted by Kinder Morgan Liquids Terminals LLC. The facility includes 8 bulk petroleum storage tanks, 17 smaller storage tanks (additive, slop, butane, fuel oil storage, etc.), 1 five-lane truck loading rack, 1 carbon adsorption/absorption vapor recovery unit (VRU), and 1 vapor combustion unit (VCU).

The applicant is represented by:

Mr. Raymond Wagner, Plant Manager
Kinder Morgan Liquids Terminals, LLC
801 E. Ordnance Road
Baltimore, MD 21226

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting Page's Title V link under "Draft Title V Permits" and may be viewed here:

https://tinyurl.com/DraftTitleV

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

1) The name, mailing address, and telephone number of the person making the request;

2) The names and addresses of any other persons for whom the person making the request if representing; and

3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or by post at Air Quality Permits Program, Air and Radiation Administration, 1800 Washington Boulevard Suite 720, Baltimore, Maryland 21230-1720. Further information may be obtained by calling Ms. Shannon Heafey at (410) 537-4433.

KEEP PERMIT AT SITE

CONTROL NO. B- 05844

Lawrence J. Hogan, Jr.
Governor

Boyd K. Rutherford
Lieutenant Governor

State of Maryland

Ben Grumbles
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit

Part 70
[X] Operating Permit

PERMIT NO. 24-003-0309

DATE ISSUED August 1, 2019

PERMIT FEE To be paid in accordance with COMAR 26.11.02.19B

EXPIRATION DATE July 31, 2024

LEGAL OWNER & ADDRESS

Kinder Morgan Liquids Terminals, LLC
801 East Ordnance Road
Baltimore, Maryland 21226
Attn: Mr. Raymond Wagner, Terminal Manager

SITE

Kinder Morgan Liquids Terminals, LLC
801 East Ordnance Road
Baltimore, Maryland 21226
AI#1881

SOURCE DESCRIPTION

Bulk petroleum storage and transfer terminal.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Administration

KINDER MORGAN LIQUIDS TERMINALS LLC
801 EAST ORDNANCE ROAD
BALTIMORE, MARYLAND 21226
DRAFT PART 70 OPERATING PERMIT NO. 24-003-0309

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Kinder Morgan Liquids Terminals LLC (Kinder Morgan) operates a bulk petroleum storage and transfer facility located at 801 East Ordnance Road, Baltimore, Maryland, owned by KM Phoenix Holdings LLC. The facility is located in Air Quality Area III, an ozone non-attainment area in Anne Arundel County. The primary standard industrial classification (SIC) code for this terminal is 4226.

The major activities at the facility include warehousing and storage of bulk petroleum products. The primary sources of air emissions at the facility include eight (8) bulk petroleum storage tanks, seventeen (17) smaller storage tanks (additive, slop, butane, fuel oil storage, etc.), a five-lane truck loading rack, one (1) carbon adsorption/absorption vapor recovery unit (VRU), and one (1) vapor combustion unit (VCU).

2. FACILITY INVENTORY LIST

All of the following emission units are registered under **ARA Registration No. 003-0309-9-0029**:

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-207L	One (1) 692,352-gallon distillate storage tank equipped with a cone roof.	1969
EU-208M	One (1) 2,989,014-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1926, modified in 2018 for IFR replacement.
EU-212Q	One (1) 3,267,905-gallon, gasoline storage swing tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.	1961
EU-213R	One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1995
EU-214S	One (1) 3,248,243-gallon, gasoline or Naphtha storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome	1929, modified in 2017 for

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
	which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.	Naphtha storage.
EU-215T	One (1) 2,776,821-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1930
EU-217V	One (1) 2,995,855-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1930, modified in 1998 for gasoline service.
EU-218W	One (1) 2,942,597-gallon ethanol storage tank equipped with an internal floating roof (with a fixed cone roof) with a mechanical shoe primary seal and a secondary wiper seal.	1931, modified in 2006 for ethanol storage and 2017 for IFR replacement.
EU-LR	A five-lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.	1989, modified in 2006, 2011, and 2022.
EU-7	One (1) 225-gallon, fuel additive, horizontal storage tank.	2001
EU-8	One (1) 225-gallon sample return tank associated with the butane blending system. Note: this emission unit was previously for one (1) 300-gallon, fuel additive, horizontal storage tank.	2011
EU-9	One (1) 2,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-10	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-11	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-12	One (1) 60,000-gallon pressurized butane bullet. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.	2011
EU-13	One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.	1997
EU-14	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-15	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-16	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-17	One (1) 8,200-gallon, fuel additive, horizontal storage tank.	Unknown
EU-18	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-19	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-20	One (1) 550-gallon, heating oil, horizontal storage tank.	2001
EU-23	One (1) 4,500-gallon, slop refined ethanol, horizontal storage tank.	2006
EU-25	One (1) 350-gallon, off-spec/slop, horizontal storage tank.	Unknown
EU-26	One (1) 4,300-gallon, fuel additive, horizontal storage tank.	2004

Note: EU-7, 8, 9, 12, 13, 14, 18, 19, 20, 25, and 207L are listed in the insignificant activities section.

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide

TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to

the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any

new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(a) The proposed change meets the criteria for a minor permit modification, and

(b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15, but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

The Permittee shall submit risk management plans by the date specified in 40 CFR 68.150.

The Permittee shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,
(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons

who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons performing maintenance, service, repairs, or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [**Authority: COMAR 26.11.03.06C(5)(g)]**

Table IV – 1	
1.0	**Emissions Unit Number(s)** **ARA Registration No. 003-0309-9-0029** EU-208M: One (1) 2,989,014-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. EU-212Q: One (1) 3,267,905-gallon, gasoline storage swing tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal. EU-214S: One (1) 3,248,243-gallon, gasoline or Naphtha storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal. EU-215T: One (1) 2,776,821-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.

Table IV – 1	
1.1	**Applicable Standards/Limits:** Control of VOC and HAP A. COMAR 26.11.13.03A(1)(a) and (b), which require the Permittee to meet the following equipment requirements for large, closed top storage tanks: 1. Each tank's gauging and sampling devices shall be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]** 2. Each of the storage tanks shall be operated with a well-maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)(i)]** B. COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements: 1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]** 2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]** 3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]** C. 40 CFR §60.112b(a)(1), which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i), §60.112b(a)(1)(ii)(A), §60.112b(a)(1)(ii)(C), and §60.112b(a)(1)(iii). **[Authority: 40 CFR §60.112b(a)(1), 40 CFR §63.11087(a) and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]**

Table IV – 1	
	The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the gasoline storage tanks at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i), 40 CFR §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]** **[Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2).]**
1.2	**Testing Requirements:** Control of VOC and HAP A. See Monitoring, Record Keeping, and Reporting Requirements. B. During all internal tank inspections, the Permittee shall determine the total seal gap by summing the areas of the individual gaps. The lengths and widths of the gaps shall be measured by passing a 1/8-inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal). **[Authority: COMAR 26.11.13.03A(4)]** C. See Monitoring, Record Keeping, and Reporting Requirements.
1.3	**Monitoring Requirements:** Control of VOC and HAP A. The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure

Table IV – 1	
	that the device will be repaired, or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.03.06C]** B. and C. The Permittee shall meet the following monitoring requirements: 1. The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), and 40 CFR §60.113b(a)(1)]** 2. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired, or the vessel will be emptied as soon as possible. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(2), §60.113b(a)(3)(ii), COMAR 26.11.13.03A(3)(a), and COMAR 26.11.13.03A(3)(b)]** Note: The annual inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(2) and (a)(3)(ii) satisfies the annual inspection requirements of COMAR 26.11.13.03A(3)(a) and (b).

Table IV – 1	
	3. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with volatile organic liquid. The storage vessel shall be emptied, degassed, and inspected in accordance with the specifications of this paragraph at a frequency of no less than once every ten (10) years. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(3)(i), 40 CFR §60.113b(a)(4), and COMAR 26.11.13.03A(3)(c)]**. Note: Compliance with the internal inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(3)(i) and (a)(4) satisfy the internal inspection requirements of COMAR 26.11.13.03A(3)(c). Based on the revisions to 40 CFR, Part 60, Subpart Kb dated January 19, 2021, the Permittee has the option to meet the inspection requirements by complying with 40 CFR 63 Subpart WW, which allows 10-year internal seal inspection to be conducted while the tanks remain in service. If the Permittee chooses to comply with 40 CFR 63 Subpart WW, the Permittee must also comply with all conditions specified under 40 CFR 60.110b(e)(5), including the recordkeeping and reporting requirements listed under 40 CFR 60.110b(e)(5)(iv).
1.4	**<u>Record Keeping Requirements</u>:** <u>Control of VOC and HAP</u> A. The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]**

Table IV – 1	
	B. and C. The Permittee shall maintain the following records: **[Authority: COMAR 26.11.13.03C(4)]** 1. Keep a record of each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: COMAR 26.11.13.03C(1), 40 CFR §60.115b(a)(2), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]** 2. All repairs or replacement of the seals, including the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]** 3. The average monthly storage temperature and throughput for each storage tank **[Authority: COMAR 26.11.13.03C(3)]**.
1.5	**<u>Reporting Requirements</u>:** <u>Control of VOC and HAP</u> A. Records of visual inspections of each tank's gauging and sampling devices shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** B. and C. The Permittee shall meet the following reporting requirements: 1. The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR §60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR §60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall

Table IV – 1	
	notify the Department at least seven (7) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least seven (7) days prior to the refilling. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(5), and COMAR 26.11.13.03A(3)(d)]** 2. If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), a report shall be furnished to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied, or the nature of and date the repair was made. This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: 40 CFR §60.115b(a)(3), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]** 3. After each inspection required by 40 CFR §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii), a report shall be furnished to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: 40 CFR §60.115b(a)(4), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]** 4. The Permittee shall submit to the Department semiannual compliance reports that include the following information: (a) Records of each inspection performed for each of the storage tanks as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), (a)(4), and COMAR 26.11.13.03A(3). **[Authority: 40 CFR**

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	§60.115b(a)(2), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)] (b) Reports of any of the storage tanks having the defects described in 40 CFR §60.113b(a)(2) that are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2). **[Authority: 40 CFR §60.115b(a)(3), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)]** (c) Reports that find any of the storage tanks not meeting the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) during inspections required by 40 CFR §60.113b(a)(3). **[Authority: 40 CFR §60.115b(a)(4), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Units Numbers: EU-208M, 212Q, 214S, and 215T.

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2.0	**<u>Emissions Unit Number(s)</u>** **ARA Registration No. 003-0309-9-0029** EU-213R: One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. EU-217V: One (1) 2,995,855-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. EU-218W: One (1) 2,942,597-gallon, ethanol storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.

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2.1	**Applicable Standards/Limits:** Control of VOC and HAP A. COMAR 26.11.13.03A(1)(a) and (b), which require the Permittee to meet the following equipment requirements for large, closed top storage tanks: 1. Each tank's gauging and sampling devices shall be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]** 2. Each of the storage tanks shall be operated with a well-maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]** B. COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements: 1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]** 2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]** 3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]** C. 40 CFR §60.112b(a)(1), which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i) through (ix), including the following requirements: **[Authority: 40 CFR §60.112b(a)(1)]** 1. The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the gasoline storage tanks at all times, except during

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	initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i)]** 2. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: **[Authority: 40 CFR §60.112b(a)(1)(ii)]** (a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. (b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. (c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. 3. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. **[Authority: 40 CFR §60.112b(a)(1)(iii)]** 4. The cover or lid for each opening in the internal floating roof shall be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be

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bolted except when they are in use. **[Authority: 40 CFR §60.112b(a)(1)(iv)]**

5. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. **[Authority: 40 CFR §60.112b(a)(1)(v)]**

6. Rim space vents shall be equipped with a gasket and shall be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. **[Authority: 40 CFR §60.112b(a)(1)(vi)]**

7. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. **[Authority: 40 CFR §60.112b(a)(1)(vii)]**

8. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. **[Authority: 40 CFR §60.112b(a)(1)(viii)]**

9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. **[Authority: 40 CFR §60.112b(a)(1)(ix)]**

[Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2). In accordance with 40 CFR §63.11087(f), demonstrating compliance with the control requirements of 40 CFR, Part 60, Subpart Kb demonstrates compliance with the storage tank requirements of 40 CFR, Part 63, Subpart BBBBBB.]

Operational Requirement

C. The Permittee shall not store gasoline in Tank EU-218W unless the Permittee applies for and obtains a permit to construct from the Department. **[Authority: ARA Permit to Construct No. 003-9-0029 issued May 9, 2017]**

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2.2	**Testing Requirements:** Control of VOC and HAP A. See Monitoring, Record Keeping, and Reporting Requirements. B. For each of the three (3) storage tanks, the Permittee shall determine the total seal gap of each storage tank during all internal inspections by summing the areas of the individual gaps. The lengths and widths of the gaps shall be measured by passing a 1/8-inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal). **[Authority: COMAR 26.11.13.03A(4)]** C. See Monitoring, Record Keeping, and Reporting Requirements. Operational Requirement D. See Record Keeping and Reporting Requirements.
2.3	**Monitoring Requirements:** Control of VOC and HAP A. The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices for each of the three (3) storage tanks. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the device will be repaired, or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.03.06C]** B and C. The Permittee shall meet the following monitoring requirements: 1. The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal,

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	the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §60.113b(a)(1)]** 2. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired, or the vessel will be emptied as soon as possible. **[Authority: 40 CFR §60.113b(a)(2), §60.113b(a)(3)(ii), COMAR 26.11.13.03A(3)(a), and COMAR 26.11.13.03A(3)(b)]** Note: The annual inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(2) and (a)(3)(ii) satisfies the annual inspection requirements of COMAR 26.11.13.03A(3)(a) and (b). 3. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with

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	volatile organic liquid. The storage vessel shall be emptied, degassed, and inspected in accordance with the specifications of this paragraph at a frequency of no less than once every ten (10) years. **[Authority: 40 CFR §60.113b(a)(3)(i), §60.113b(a)(4), and COMAR 26.11.13.03A(3)(c)]**. Note: Compliance with the internal inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(3)(i) and (a)(4) satisfy the internal inspection requirements of COMAR 26.11.13.03A(3)(c). Based on the revisions to 40 CFR, Part 60, Subpart Kb dated January 19, 2021, the Permittee has the option to meet the inspection requirements by complying with 40 CFR 63 Subpart WW, which allows 10-year internal seal inspection to be conducted while the tanks remain in service. If the Permittee chooses to comply with 40 CFR 63 Subpart WW, the Permittee must also comply with all conditions specified under 40 CFR 60.110b(e)(5), including the recordkeeping and reporting requirements listed under 40 CFR 60.110b(e)(5)(iv). <u>Operational Requirement</u> D. See Record Keeping and Reporting Requirements.
2.4	**<u>Record Keeping Requirements</u>:** <u>Control of VOC and HAP</u> A. The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** <u>Control of VOC and HAP / Operational Requirement</u> B., C., and D. The Permittee shall: 1. Keep a record of each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each

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	component of the control equipment (seals, internal floating roof, and fittings). **[Authority: COMAR 26.11.13.03C(1) and 40 CFR §60.115b(a)(2)]** 2. Record all repairs or replacement of the seals, including the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]** 3. Record the average monthly storage temperature and throughput for each storage tank. **[Authority: COMAR 26.11.13.03C(3)]** 4. Maintain readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel. The records shall be maintained on-site for the life of the storage vessels. **[Authority: 40 CFR §60.116b(a) and (b)]** **4.** Maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of the volatile organic liquid during the respective storage period for each storage tank. **[Authority: 40 CFR §60.116b(c)]** The maximum true vapor pressure shall be determined using the procedures listed in 40 CFR §60.116b(e). **[Authority: 40 CFR §60.116b(e)]**
2.5	**<u>Reporting Requirements</u>:** <u>Control of VOC and HAP</u> A. Records of visual inspections of each tank's gauging and sampling devices shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06]** B. and C. The Permittee shall meet the following reporting requirements: 1. The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR §60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR §60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30

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	days in advance of refilling the tank, the Permittee shall notify the Department at least seven (7) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least seven (7) days prior to the refilling. **[Authority: 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d)]** 2. If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), a report shall be furnished to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied, or the nature of and date the repair was made. **[Authority: 40 CFR §60.115b(a)(3)]** 3. After each inspection required by 40 CFR §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii), a report shall be furnished to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. **[Authority: 40 CFR §60.115b(a)(4)]** <u>Operational Requirement</u> D. The Permittee shall notify and obtain approval from the Department prior to storing gasoline in storage tank EU-218W. **[Authority: ARA Permit to Construct No. 003-9-0029 issued May 9, 2017, and COMAR 26.11.02.09A]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Units Numbers: EU-213R, 217V, and 218W.

Table IV – 3	
3.0	**Emissions Unit Number(s)** **ARA Registration Number: 003-0309-9-0029** EU-10: One (1) 8,000-gallon, fuel additive, horizontal storage tank. EU-11: One (1) 8,000-gallon, fuel additive, horizontal storage tank. EU-15: One (1) 10,000-gallon, fuel additive, horizontal storage tank. EU-16: One (1) 10,000-gallon, fuel additive, horizontal storage tank. EU-17: One (1) 8,200-gallon, fuel additive, horizontal storage tank. EU-23: One (1) 4,500-gallon, ethanol, horizontal storage tank. EU-26: One (1) 4,300-gallon, fuel additive, horizontal storage tank.
3.1	**Applicable Standards/Limits:** Control of VOC A. COMAR 26.11.06.06B(1)(a), which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-15, EU-16, and EU-17. COMAR 26.11.06.06B(1)(b), which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-10, EU-11, EU-23, and EU-26. Operational Requirement B. The Permittee shall store only additive or other volatile organic liquids that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains approval from the Department. **[Authority: COMAR 26.11.02.09A]**

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3.2	**Testing Requirements:** Control of VOC / Operational Requirement A. and B. See Record Keeping and Reporting Requirements.
3.3	**Monitoring Requirements:** Control of VOC / Operational Requirement A. and B. See Record Keeping and Reporting Requirements.
3.4	**Record Keeping Requirements:** Control of VOC / Operational Requirement A. and B. The Permittee shall maintain the following annual records of the amounts, types, and composition of all materials loaded into each tank **[Authority: ARA Permit to Construct No. 02-9-0599 issued on February 2, 1998]**
3.5	**Reporting Requirements:** Control of VOC / Operational Requirement A. and B. The Permittee shall make the records of the description of the materials loaded into each tank available to the Department upon request. **[Authority: ARA Permit to Construct No. 02-9-0599 issued on February 2, 1998]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emission Unit Numbers 10, 11, 15, 16, 17, 23, and 26.

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4.0	**Emissions Unit Number(s)** **ARA Registration No. 003-0309-9-0029** EU-LR: A five lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.
4.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations **COMAR 26.11.06.02C(2)**, which prohibits visible emissions other than water in an uncombined form. This limitation applies to the John Zink VCU only. Exceptions. **COMAR 26.11.06.02A(2)** establishes that the visible emissions limitation does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period. B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The vapor collection and control system controlling emissions from the loading system shall collect the total organic compound (TOC) vapors displaced from cargo tanks during product loading and shall control at least 90 percent of all vapors from the loading racks. **[Authority: 40 CFR §60.502(a), COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(a)]** 2. The emissions from the vapor collection and control system shall be limited to 0.058 pounds of TOC per 1,000 gallons (7 milligrams of TOC per liter) of gasoline or VOC loaded. Note: Compliance with this requirement also demonstrates compliance with the requirements of COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b). **[Authority: COMAR**

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	26.11.03.06C, COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b)] This emissions limitation is equivalent to the following: VOC emissions from the VRU or the VCU when controlling emissions from the loading rack shall be less than 6.5 pounds per hour (based on the emission factor of 7 milligrams of TOC per liter when loading 108,000 gallons of gasoline per hour), unless the Permittee demonstrates to the satisfaction of the Department that the modification to the loading rack to allow butane blending is not considered a modification in accordance with the New Source Performance Standards of 40 CFR, Part 60, Subparts A and XX at a higher emission rate. **[Authority: ARA Permit to Construct No. 003-0309-9-0039 issued March 29, 2022]** C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements) The Permittee shall limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR, Part 60, Subpart XX, §60.502(e) through (j). For the purposes of this requirement, the term "tank truck" as used in 40 CFR §60.502(e) through (j) means "cargo tank" as defined in 40 CFR §63.11100. **[Authority: 40 CFR §63.11088(a) and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(d)]** The Permittee may not allow a gasoline or VOC tank truck to be filled or emptied unless the tank has been certified annually as capable of sustaining a pressure change of not more than one (1) inch of water (equivalent to a fugitive emission rate of 8 milligrams per liter of gasoline or VOC loaded) in five (5) minutes when pressurized to a gauge pressure of 18 inches of water (4,479 kilonewtons/square meter), or evacuated to a gauge pressure of six (6) inches of water (1,493 kilonewtons/square meter), during a test, according to the procedure referenced in COMAR 26.11.13.05B(2). The Permittee shall complete any needed repairs, and retest within 15 days of the original test date. **[Authority: 40 CFR §60.502(e) and COMAR 26.11.13.05A and B]** D. Control of VOC and HAP (Back Pressure and Leak Requirements)

Table IV – 4

The vapor collection and control system and the liquid loading equipment shall be operated to control back pressure and leaks such that:

1. The gauge pressure in the delivery tank shall not exceed 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR §60.503(d). **[Authority: 40 CFR §60.502(h) and §60.503(d)]**

2. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection and control system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **[Authority: 40 CFR §60.502(i)]**

3. During loading, the gasoline or VOC tank truck pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water. **[Authority: COMAR 26.11.13.04A(1)(b)(i)]**

4. There are no gasoline or VOC leaks in the system when tested by the method referenced in COMAR 26.11.13.04A(3)(a) during loading or unloading operations. **[Authority: COMAR 26.11.13.04A(1)(b)(ii)]**

E. Control of VOC and HAP (Design and Operational Requirements)

1. The exhaust gases from the loading rack shall vent through the VRU or the VCU prior to discharging to the atmosphere. **[Authority: COMAR 26.11.03.06C]**

2. The vapor collection system shall prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack or lane to the atmosphere. **[Authority: 40 CFR §60.502(d), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c)]**

3. The Permittee shall assure that loadings of gasoline or VOC tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. **[Authority: 40 CFR §60.502(f)]**

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	4. The Permittee shall assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline or VOC tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. **[Authority: 40 CFR §60.502(g)]** 5. The Permittee shall maintain a top submerged or bottom loading system on the terminal's loading racks. **[Authority: COMAR 26.11.13.04A(1)(c)]** F. Control of VOC and HAP (Operational Requirement) The Permittee shall only load ethanol from the fifth lane of the loading rack unless prior approval is obtained from the Department to load other materials. **[Authority: ARA Permit to Construct No. 003-0309-9-0029 issued on March 29, 2022]**
4.2	**Testing Requirements:** A. Visible Emissions Requirements See Monitoring, Record Keeping, and Reporting Requirements. B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall conduct performance tests on the facility's VCU and VRU to determine total organic emissions per liter of gasoline loaded at the facility and to determine an overall control efficiency for VOC emissions caused by the facility's loading operations at least once every five (5) years, during the period between May and September 15. **[Authority: COMAR 26.11.13.04A(2)(a)(i)]** 2. The tests shall be conducted in accordance with the test methods and procedures listed in 40 CFR §63.11092(a)(1)(i) and (ii), 40 CFR §60.503(a), §60.503(b), and §60.503(c) and Method 1009 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991). **[Authority: 40 CFR §60.503(a) through (c), COMAR**

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26.11.13.04A(3)(b), 40 CFR §63.11092(a)(1)(i) and (ii), and 40 CFR §63.11092(a)(2)]

3. The Permittee shall notify the Department not less than 60 days before the scheduled test date, and the notification shall contain a copy of the test protocol required under COMAR 26.11.13.04A(2)(a)(ii) and 40 CFR §63.7(c). A copy of the test results shall be submitted to the Department no later than 60 days after the test date. **[40 CFR §63.9(e), §63.11093(c), COMAR 26.11.13.04A(2)(a)(ii) and (iii)]**

4. Unless the Permittee obtains from the Department written approval to monitor and record an alternative operating parameter, during each required performance test on the VRU, the Permittee shall continuously monitor and record the organic compound concentration in the exhaust air stream using a continuous emissions monitoring system (CEMs). **[Authority: 40 CFR §63.11092(b)(1), §63.11092(b)(1)(i)(A), §63.11092(b)(1)(iv), §63.11092(b)(3), (4), and (5)]**

5. For all subsequent performance tests performed after the initial performance test required under 40 CFR §63.11092(a), the Permittee shall document the reasons for any change in the operating parameter values since the previous performance test. **[Authority: 40 CFR §63.11092(c)]**

6. Performance tests conducted shall be conducted under conditions that the Department specifies based on representative performance (i.e., performance based on normal operating conditions) of the VRU or the VCU. The Permittee shall make available to the Department upon request necessary records to determine the conditions of the performance tests. **[Authority: 40 CFR §63.11092(g)]**

C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The annual certification test for gasoline cargo tanks shall consist of the following test methods: EPA Method 27, Appendix A-8, 40 CFR Part 60 and Method1007 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources," (January 1991) which is incorporated by reference in COMAR 26.11.01.04C.

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The test shall be conducted using a time period (t) for the pressure and vacuum tests of five (5) minutes. The initial pressure (Pi) for the pressure test shall be 18 inches of water gauge. The initial vacuum (Vi) for the vacuum test shall be six (6) inches of water, gauge. The maximum allowable pressure and vacuum changes (Δ p, Δ v) for all affected gasoline cargo tanks is three (3) inches of water, or less, in five (5) minutes.

Any needed repairs shall be completed, and the cargo tank shall be retested within 15 days of the original test date. **[Authority: COMAR 26.11.13.05B, 40 CFR §63.11088(d) and §63.11092(f)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

1. The Permittee shall test for leak-tight conditions in the vapor control system and the gasoline loading equipment during loading or unloading operations, as required in COMAR 26.11.13.04A(1)(b)(ii) each calendar month. The Permittee shall conduct the tests as prescribed in Method 1008 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991). **[Authority: COMAR 26.11.13.04A(1)(b)(ii), COMAR 26.11.13.04A(3)(a), and 40 CFR §63.11089(a)]**

2. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with +/-2.5 mm of water precision, shall be calibrated and installed on the facility's vapor collection system at a pressure tap location as close as possible to the connection with the gasoline cargo tank. **[Authority: 40 CFR §60.503(d)(1) and §60.503(h)]**

E. Control of VOC and HAP (Design and Operational Requirements)

The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]**

F. Control of VOC and HAP (Operational Requirements)

See Record Keeping and Reporting Requirements.

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4.3	**Monitoring Requirements:** A. Visible Emissions Requirements At least once per month, the Permittee shall observe the stack of the VCU as specified in the CAM Plan for visible emissions when the VCU is operating. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a six (6) minute period. If the unit does not operate during a month, a record shall be maintained to indicate that no observation was required during that month. The Permittee shall perform the following, if emissions are visible: 1. Inspect combustion control and damper system. 2. Perform all necessary adjustments and/or repairs to the combustor within 48 hours, so that visible emissions are eliminated. 3. Document in writing the results of the inspections, adjustments and/or repairs to the combustor. 4. After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. **[Authority: COMAR 26.11.03.06C and See Indicator 4 of the CAM Plan in Table IV-5]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processing system consisting of the VRU and the VCU. **[Authority: 40 CFR §63.11092(b)]** 2. When the VRU is used to control emissions from the loading rack, the Permittee shall comply with the following monitoring requirements unless the Department approves alternative

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	monitoring requirements under 40 CFR §63.8(b), §63.8(f), and 40 CFR, Part 63, Subpart BBBBBB: **[Authority: 40 CFR §63.8(b), §63.8(f), §63.11092(b)(1)(iv), and §63.11092(b)(3), (4), and (5)]** (a) The Permittee shall perform semi-annual preventative maintenance of the VRU according to the recommendations of the manufacturer of the system or other procedures approved by the Department. **[Authority: COMAR 26.11.03.06C]** (b) The Permittee shall maintain a continuous emissions monitoring system (CEMS) capable of measuring the organic compound concentration in the exhaust air stream of the VRU. The CEMS shall meet applicable performance specifications in 40 CFR 60, Appendix B. **[Authority: 40 CFR §63.11092(b)(1), §63.11092(b)(1)(i)(A), and Table 3 to 40 CFR, Part 63, Subpart BBBBBB]** (c) The Permittee shall maintain and operate the CEMS in a manner consistent with good air pollution control practices as follows: The Permittee must keep the necessary parts for routine repairs of the affected CEMS equipment readily available. **[Authority: 40 CFR §63.8(c)(1)]** (d) Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, the CEMS shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. **[Authority: 40 CFR §63.8(c)(4)]** (e) The Permittee must check the zero (low-level) and high-level calibration drifts at least once daily in accordance with the written procedure specified in the performance evaluation plan developed under 40 CFR §63.8(e)(3)(i) and (ii). The zero (low-level) and high-level calibration drifts must be adjusted, at a minimum, whenever the 24-hour zero (low-level) drift exceeds two times the limits of

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	the applicable performance specifications. The system shall allow the amount of excess zero (low-level) and high-level drift measured at the 24-hour interval checks to be recorded and quantified whenever specified. **[Authority: 40 CFR §63.8(c)(6)]** (f) The CEMS is out of control if the zero (low-level), mid-level (if applicable), or high-level calibration drift (CD) exceeds two times the applicable CD specification in the applicable performance specification; or the CEMS fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit. **[Authority: 40 CFR §63.8(c)(7)(i)]** (g) When the CEMS is out of control, the Permittee shall take necessary corrective action and shall repeat all necessary tests which indicate that the system is out of control. The Permittee shall take corrective action and conduct retesting until the performance requirements are below the applicable limits. The beginning of the out-of-control period is the hour the Permittee conducts a performance check (e.g., calibration drift) that indicates an exceedance of the performance requirements. The end of the out-of-control period is the hour following the completion of corrective action and successful demonstration that the system is within the allowable limits. During the period the CEMS is out of control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement. **[Authority: 40 CFR §63.8(c)(7)(ii)]** (h) The Permittee must reduce the CEMS monitoring data as follows: (i) Data from CEMS shall be reduced to 1-hour averages computed from four or more data points equally spaced over each 1-hour period, except during periods when calibration, quality assurance, or maintenance activities being performed. During these periods, a valid hourly average shall consist of

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at least two data points with each representing a 15-minute period. Alternatively, an arithmetic or integrated 1-hour average of CEMS data may be used. Time periods for averaging are defined in 40 CFR §63.2.

(ii) The data may be recorded in reduced or nonreduced form.

(iii) All emission data shall be converted into milligrams per liter for reporting purposes.

(iv) Monitoring data recorded during periods of unavoidable CEMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level adjustments must not be included in any data average computed unless the Permittee complies with the requirements of 40 CFR §63.10(b)(2)(vii)(A) or (B). **[Authority: 40 CFR §63.8(g)]**

3. When the VCU is used to control emissions from the loading rack, the Permittee shall comply with the CAM Plan for the VCU in Table IV-5 of this permit and the following requirements: **[Authority: 40 CFR §63.11092(b)(1) and §63.11092(b)(1)(iii)]**

(a) A continuous parameter monitoring system (CPMS) capable of measuring temperature shall be maintained in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.

OR

(b) The presence of a thermal oxidation system pilot flame shall be monitored as specified under Indicator No. 3 of the CAM Plan for the VCU using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.

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(c) Maintain a monitoring and inspection plan that describes the Permittee's approach for meeting the following requirements:

(i) The VCU shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.

(ii) The Permittee shall verify during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.

(iii) The Permittee shall perform semi-annual preventative maintenance inspections of the VCU, including the automated alarm or shutdown system according to the recommendations of the manufacturer of the system.

(iv) The monitoring and inspection plan shall specify conditions that would be considered malfunctions of the VCU during the inspections or automated monitoring, describe specific corrective actions that will be taken to correct any malfunction, and define what the Permittee would consider to be a timely repair for each potential malfunction.

[Authority: §63.11092(b)(1)(iii)]

4. The Permittee shall operate the VRU and the VCU in a manner not to exceed or not to go below, as appropriate, the operating parameter values for the parameters established in the last performance test and the CAM Plan included in Table IV-5. **[Authority: 40 CFR §63.11092(d)(1) and (2)]**.

5. Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in 40 CFR §63.11088(a), except for the following: for monitoring and

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inspection, as required under §63.11092(b)(1)(i)(B)(*2*) and (b)(1)(iii)(B)(*2*), malfunctions that are discovered shall not constitute a violation of the emission standard in 40 CFR §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The Permittee must:

(a) Initiate corrective action to determine the cause of the problem within one (1) hour.

(b) Initiate corrective action to fix the problem within 24 hours.

(c) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions.

(d) Minimize periods of start-up, shutdown, or malfunction.

(e) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem. **[Authority: 40 CFR §63.11092(d)(3) and (4)]**

6. The Permittee shall, at all times, operate and maintain any affected source subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**

C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall ensure that loadings of gasoline or VOC into tank trucks are limited to vapor-tight tank trucks using the following procedures: **[Authority: COMAR 26.11.13.05D(2), 40 CFR §60.502(e), §63.11088(a), and Table 2, Item 1(d) of 40 CFR, Part 63, Subpart BBBBBB]**

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	1. The Permittee shall obtain the vapor tightness documentation specified in 40 CFR §60.505(b) and COMAR 26.11.13.05D(2) for each gasoline or VOC tank truck which is to be loaded at the facility. **[Authority: 40 CFR §60.502(e)(1) and COMAR 26.11.13.05D(2)]** 2. The Permittee shall require the tank identification number to be recorded as each gasoline or VOC tank truck is loaded at the facility. **[Authority: 40 CFR §60.502(e)(2) and COMAR 26.11.13.05D(2)]** 3. The Permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded. **[Authority: 40 CFR §60.502(e)(3)]** (a) If less than an average of one gasoline or VOC tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or **[Authority: 40 CFR §60.502(e)(3)(i)(A)]** (b) If less than an average of one gasoline or VOC tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. **[Authority: 40 CFR §60.502(e)(3)(i)(B)]** If either the quarterly or semiannual cross-checks reveal that these conditions were not maintained, the Permittee must return to biweekly monitoring until such time as these conditions are met again. **[Authority: 40 CFR §60.502(e)(3)(ii)]** 4. The Permittee shall take steps to assure that the non-vapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. **[Authority: 40 CFR §60.502(e)(5)]** 5. Alternate procedures to those described for limiting gasoline tank truck loadings (as listed in 40 CFR §60.502(e)(1) through (e)(5)) may be approved by the Department. **[Authority: 40 CFR §60.502(e)(6)]**

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D. Control of VOC and HAP (Back Pressure and Leak Requirements)

1. The Permittee shall conduct pressure monitoring and leak inspections each calendar month of all equipment in gasoline service, as defined in 40 CFR §63.11100, including the vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC. The vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC shall be inspected during the loading of tank trucks for total organic compounds liquid or vapor leaks. For these inspections, detection methods incorporating sight, sound, and smell are acceptable. The source of the leak shall be repaired within 15 calendar days after it is detected. **[Authority: 40 CFR 40 CFR §60.502(j) and §63.11089(a)]**

2. The Permittee shall use a logbook to record the required monthly leak inspections. The logbook shall be signed by the Permittee at the completion of each inspection. A section of the logbook shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. **[Authority: 40 CFR §63.11089(b)]**

3. The Permittee shall record each detection of a liquid or vapor leak in the logbook. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except if there is a delay of repair. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR 40 CFR §63.11089(c) and (d)]**

4. Each calendar month, the Permittee shall check the back pressure in the vapor collection system during loading of tank trucks. The Permittee shall make each determination during a period of maximum product flow and at a point as close to the adapter for a gasoline tank truck's vapor recovery line as possible. **[Authority: See Indicator 1 of the CAM Plan in Table IV-5]**

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	E. Control of VOC and HAP (Design and Operational Requirements) The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]** F. Control of VOC and HAP (Operational Requirements) See Record Keeping and Reporting Requirements.
4.4	**Record Keeping Requirements:** A. Visible Emissions Requirements The Permittee shall maintain a log of the visible emissions observations performed as specified in the CAM Plan on the VCU and any corrective actions taken. **[Authority: COMAR 26.11.03.06C and see Indicator 4 of the CAM Plan in Table IV-5]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall maintain the following records for the vapor recovery collection system and the VRU: (a) Records of all mass emission rate performance tests conducted on the VRU. **[Authority: COMAR 26.11.13.04A(2)(a)(iii)]** (b) Records of all maintenance and repairs performed on the VRU. **[Authority: COMAR 26.11.13.04A(2)(b)]** (c) Records of all replacements or additions of components on the VRU. **[Authority: 40 CFR §60.505(f)]** (d) A copy of the performance evaluation results for the CEMS. **[Authority: 40 CFR §63.8(e)(5)]** (e) An up-to-date, readily accessible record of the CEMS data required under 40 CFR §63.11092(b). These records shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the CEMS data only during such loadings. The date and time of day shall also be

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	indicated at reasonable intervals on these records. **[Authority: 40 CFR §63.11094(f)(1)]** 2. The Permittee shall maintain the following records for the vapor recovery collection system and the VCU: (a) Records of all mass emission rate performance tests conducted on the VCU. **[Authority: COMAR 26.11.13.04A(2)(a)(iii)]** (b) Records of all maintenance and repairs performed on the VCU. **[Authority: COMAR 26.11.13.04A(2)(b)]** (c) Records of all replacements or additions of components on the VCU. **[Authority: 40 CFR §60.505(f)]** (d) An up-to-date readily accessible copy of the monitoring and inspection plan required under 40 CFR §63.11092(b)(1)(iii)(B)(*2*). **[Authority: 40 CFR §63.11094(f)(3)]** (e) An up-to-date, readily accessible record of all system malfunctions including records of the occurrence and duration of each malfunction of operation of process equipment or the air pollution control and monitoring equipment. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore manufacturing process and air pollution control and monitoring equipment to its normal or usual manner of operation. As specified in §63.11092(b)(1)(iii)(B)(*2*)(*v*), the Permittee shall document any system malfunction associated with the VCU, as defined in the VCU monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a logbook or other permanent form of a record. These records shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of

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the amount of gasoline loaded during the period of the malfunction.

[Authority: 40 CFR §63.11094(f)(4), §63.11094(g)(1) and (2), §63.11092(b)(1)(iii)(B)(*2*)(*v*), and Indicator 3 of the CAM Plan, Table IV-5]

(f) Records of all preventative maintenance as required by the CAM Plan for the VCU. **[Authority: See Indicator 3 of the CAM Plan in Table IV-5]**

C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall maintain the following records to ensure each tank truck's vapor tightness, including annual certification testing performed in accordance with 40 CFR §63.11092(f)(1) **[Authority: 40 CFR §63.11094(b) and §63.11094(b)(1)]**:

1. Records of each tank truck's vapor tightness documentation required under §60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. **[Authority: 40 CFR §60.505(a)]**

   Records of each tank truck's vapor tightness documentation file shall be updated at least once per year to reflect current test results as determined by EPA Reference Method 27. In accordance with 40 CFR §60.505(b) and COMAR 26.11.13.05D(2), this documentation shall include, as a minimum, the following information:
   (a) Test title: Gasoline Delivery Tank Pressure Test – EPA Reference Method 27 or an approved alternative method.
   (b) Tank owner and address.
   (c) Tank identification number.
   (d) Testing location.
   (e) Date of test.
   (f) Date and type of repair, if applicable.
   (g) Date of retest, if applicable.
   (h) Tester name and signature.
   (i) Witnessing inspector, if any: Name, signature, and affiliation.
   (j) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.
   (k) Test results: Actual pressure change in 5 minutes, millimeters of water (average for two (2) runs).

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	(l) Pressure testing: The initial and final test pressure, the time of each reading, and the actual pressure change. (m) Vacuum testing: The initial and final test vacuum, the time of each reading, and the actual vacuum change. (n) Number of leaks found with an instrument and leak definition. **[Authority: COMAR 26.11.13.05D(1)(a), COMAR 26.11.13.05D(2), 40 CFR §60.505(b), §63.11088(f), §63.11094(b)(2)]** 2. Documentation of all notifications for non-vapor-tight tank trucks as specified in 40 CFR §60.502(e)(4). **[Authority: 40 CFR §60.505(d)]** 3. As an alternative to keeping records at the terminal of each gasoline or VOC cargo tank test results as required in 40 CFR §60.505(a), (c), (d), and §63.11094(b), the Permittee may comply with one of the following requirements: **[Authority: 40 CFR §60.505(e), §63.11088(f), and 40 CFR §63.11094(c)(1) and (2)]** (a) An electronic copy of each record is instantly available at the terminal. **[Authority: 40 CFR §60.505(e)(1) and 40 CFR §63.11094(c)(1)]** (i) The copy of each record in paragraph §60.505(e)(1) and 40 CFR §63.11094(c)(1) is an exact duplicate image of the original paper record with certifying signatures. **[Authority: 40 CFR §60.505(e)(1)(i) and 40 CFR §63.11094(c)(1)(i)]** (ii) The Department is notified in writing that each terminal using this alternative is in compliance with paragraph §60.505(e)(1) and 40 CFR §63.11094(c)(1). **[Authority: 40 CFR §60.505(e)(1)(ii) and 40 CFR §63.11094(c)(1)(ii)]** **OR** (b) For facilities that utilize a terminal automation system to prevent gasoline or VOC cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by Department representatives during the course of a site visit, or within a mutually agreeable time frame. **[Authority: 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2)]**

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(i) The copy of each record in 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2) is an exact duplicate image of the original paper record with certifying signatures. **[Authority: 40 CFR §60.505(e)(2)(i) and 40 CFR §63.11094(c)(2)(i)]**

(ii) The Department is notified in writing that each terminal using this alternative is in compliance with 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2). **[Authority: 40 CFR §60.505(e)(2)(ii) and 40 CFR §63.11094(c)(2)(ii)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

1. To demonstrate compliance with the leak detection requirements under 40 CFR §63.11089, the Permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. If the Permittee elects to implement an instrument program under §63.11089, the record shall include a full description of the program. **[Authority: 40 CFR §63.11094(d)]**

2. The Permittee shall maintain monthly leak inspection records consisting of each detection of a total organic compounds liquid or vapor leak from the vapor collection system, the vapor processing system, and each loading rack handling gasoline. The inspection records shall include, as a minimum, the following information: **[Authority: 40 CFR §60.502(j), 40 CFR §60.505(c), and 40 CFR §63.11094(e)]**

(a) Date of inspection.
(b) The equipment type and identification number.
(c) Findings: may indicate no leaks discovered; or location, nature of the leak (i.e., vapor or liquid), and severity of each leak.
(d) Leak determination method (i.e., sight, sound, or smell).
(e) The date the leak was detected, the date of each attempt to repair the leak, and reasons for any repair interval in excess of fifteen (15) days.
(f) Repair methods applied in each attempt to repair the leak.
(g) The expected date of successful repair of the leak if the leak is not repaired within 15 days.
(h) The date of successful repair of the leak.

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	(i) Inspector name and signature. 3. The Permittee shall maintain monthly records of the back pressure reading in the vapor collection system during the loading of tank trucks during a period of maximum product flow. **[See Indicator 1 of the CAM Plan, Table IV-5]** E. Control of VOC and HAP (Design and Operational Requirements) The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]** F. Control of VOC and HAP (Operational Requirements) 1. Records of the types and amounts of materials loaded in the fifth lane of the loading rack. **[Authority: ARA Permit to Construct No. 003-9-0029 issued on April 11, 2006]** 2. Records of the types and amounts of materials loaded in the four (4) lanes of the loading rack loading gasoline and distillate products. **[Authority: ARA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**
4.5	**Reporting Requirements:** A. Visible Emissions Requirements The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations” and any corrective actions on the VCU as specified in the CAM Plan. **[Authority: COMAR 26.11.03.06 and See Indicator 4 of the CAM Plan Table IV-5]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall notify the Department prior to using the VCU as a main control device for purposes other than VRU maintenance when the duration of such non-maintenance usage is more than seven (7) consecutive days. **[Authority: ARA Permit to Construct No. 003-0309-9-0039 issued October 3, 2011]**

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2. The Permittee shall submit an excess emissions report to the Department. The excess emissions report shall be submitted as a part of the semiannual compliance report. The excess emissions report shall include the following information: **[Authority: 40 CFR §63.8(c)(8), §63.11088(f), and §63.11095(b)]**

   (a) Each instance of non-vapor-tight gasoline cargo tank loading which failed to assure that such cargo tank would not be reloaded before vapor tightness documentation was obtained.

   (b) Each reloading of a non-vapor-tight gasoline cargo tank before vapor tightness documentation is obtained in accordance with 40 CFR §63.11094(b).

   (c) Each exceedance or failure to maintain the monitored operating parameter value determined under 40 CFR §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

   (d) Each instance in which malfunctions discovered during the monitoring and inspections required under 40 CFR §63.11092(b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.

   (e) For each occurrence of an equipment leak for which no repair attempt was made within five (5) days or for which repair was not completed within 15 days after detection:

      (i) The date on which the leak was detected.

      (ii) The date of each attempt to repair the leak.

      (iii) The reasons for the delay of repair.

      (iv) The date of successful repair.

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3. The Permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period, and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11085(a), including actions taken to correct a malfunction. The report shall be submitted as a part of the semiannual compliance report. **[Authority: 40 CFR §63.11088(f) and §63.11095(d)]**

4. The Permittee shall report all deviations from Indicator 3 of the CAM Plan requirements as specified in the CAM Plan for the VCU included in Table IV-5. The Permittee shall submit these deviations with the semiannual monitoring report.

C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall notify the owner or operator of each non-vapor-tight gasoline or VOC tank truck loaded at the facility within one (1) week of the documentation cross-check required by 40 CFR §60.502(e)(3), or within three (3) weeks after the loading has occurred. **[Authority: 40 CFR §60.502(e)(4), §63.11088(a), and Table 2 of 40 CFR, Part 63, Subpart BBBBBB, Item 1(d)]**

The Permittee shall submit to the Department semiannual compliance reports that include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. **[Authority: 40 CFR §63.11088(f), §63.11095(a), and §63.11095(a)(2)]**
This report shall be submitted along with the semiannual monitoring report.

The Permittee shall submit to the Department upon request copies of certification test records from the leak-tight conditions tests required under COMAR 26.11.13.04A(3)(a). **[Authority: COMAR 26.11.13.05D(1)(b)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

The Permittee shall report all deviations from Indicator 1 and Indicator 2 of the CAM Plan requirements as specified in the CAM Plan for vapor line back pressure and equipment leaks. The Permittee shall

Table IV – 4	
	submit these deviations with the semiannual monitoring report. **[Authority: See Indicator 1 and Indicator 2 of the CAM Plan, Table IV-5]** The Permittee shall submit to the Department semiannual compliance reports that include the number of equipment leaks not repaired within 15 days after detection. **[Authority: 40 CFR §63.11088(f) and §63.11095(a)(3)]** These reports shall be submitted with the semiannual monitoring report. E. Control of VOC and HAP (Design and Operational Requirements) The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]** F. Control of VOC and HAP (Operational Requirements) The Permittee shall submit records of the types and amounts of materials loaded in each of the five lanes of the loading rack to the Department upon request. **[Authority: ARA Permit to Construct No. 003-9-0029 issued on April 11, 2006, and ARA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]** The Permittee shall submit notifications specified in 40 CFR §63.9, as applicable. **[Authority: 40 CFR §63.11087(d), 40 CFR §63.11093(d), and 40 CFR §63.9]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Unit EU-LR.

TABLE IV-5 CAM PLAN FOR THE VAPOR COMBUSTION UNIT (VCU)

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 1**
I. Indicator 64.4(a)(1)	Vapor Line Back Pressure
Monitoring Approach	Pressure Gauge
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as anytime the pressure gauge indicates greater than 18” of water and truck loading is still occurring. All pressure gauge readings greater than 18” water column shall be reported to the MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The back pressure is monitored using a portable pressure gauge which is placed on the vapor hose connection to the tanker truck.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. AQ/QC Practices and Criteria	Preventative maintenance is performed on the back pressure gauge two (2) times per year. The back pressure gauge is calibrated or replaced at least once every five (5) years during the VRU performance test.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly visual reading with manual log entry.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 2**
I. Indicator 64.4(a)(1)	Equipment Leaks

Monitoring Approach	Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline will be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days. All excursions and corrective actions taken shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection Procedures	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit--VCU	**Indicator No. 3**
I. Indicator 64.4(a)(1)	Presence of flame within the VCU stack.

Monitoring Approach	Pilot (flame) detector
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU and loading rack cannot operate if no flame is detected.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on the VCU two times per year. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot gas strainer. • Pull and clean assist gas strainer. • Check all indicator lights and sensors, replace if faulty. • Inspect spark ignition systems. • Ensure burner scanner is operating properly by blocking scanner and starting unit. Unit should shut down upon pilot flame failure. • Complete start-up procedure is checked.
D. Monitoring Frequency	Pilot detector operates continuously.

E. Data Collection Procedures	Results of inspections and preventative maintenance of the pilot operation are manually recorded and maintained on site.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit - VCU	**Indicator No. 4**
I. Indicator 64.4(a)(1)	Visible emissions observations during loading operation.
Monitoring Approach	Conduct visible emissions observations.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and record keeping requirements.
D. Monitoring Frequency	At least once per month, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 6-minute period.
E. Data Collection Procedures	Results of observations will be manually recorded and maintained on site. Records will include date, time, and results of the observation.
F. Averaging Period	N/A

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6.0	**Emissions Unit Number(s)** Facility Wide Requirements
6.1	**Applicable Standards/Limits:** HAP and VOC Emissions Limitations A. Facility wide HAP emissions shall be less than 10 tons for any single HAP and 25 tons for the total combination of HAPs in any consecutive twelve (12) month period. **[Authority: COMAR 26.11.03.06C]** B. Total gasoline/ethanol throughput shall not exceed 670 million gallons in any consecutive twelve (12) month period and distillate throughput shall not exceed 100 million gallons in any consecutive twelve (12) month period, unless the Permittee demonstrates to the satisfaction of the Department, that non-attainment NSR requirements do not apply to the modification to the loading rack to allow blending butane with gasoline products. **[Authority: ARA Permit to Construct No. 003-0309-9-0039 issued March 29, 2022]** C. The Permittee shall, at all times, operate and maintain any affected source including associated air pollution control equipment and monitoring equipment subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**
6.2	**Testing Requirements:** HAP and VOC Emissions Limitations A. At least once per year, the Permittee shall test or have the fuel supplier test all fuels for HAP content including individual HAP speciation amounts. In lieu of the annual testing requirement, the

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	Permittee may demonstrate compliance with the facility wide HAP limitations through the use of HAP content documentation and/or test data provided by the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06]** B. See Record Keeping and Reporting Requirements C. See Monitoring, Record Keeping, and Reporting Requirements.
6.3	**Monitoring Requirements:** HAP and VOC Emissions Limitations A. and B. See Record Keeping and Reporting Requirements. C. The Permittee shall perform monthly leak inspections of all equipment in gasoline service, as defined in 40 CFR §63.11100. For these inspections, detection methods incorporating sight, sound, and smell are acceptable. **[Authority: 40 CFR §63.11089(a)]**
6.4	**Record Keeping Requirements:** HAP and VOC Emissions Limitations A. The following records shall be kept on-site for at least five (5) years and shall be made available to the Department upon request: 1. Monthly records of facility wide HAP emissions; and 2. Annual HAP content test results or HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06C]** B. The Permittee shall maintain monthly records to document that total gasoline/ethanol throughput loaded into tank trucks for each consecutive twelve (12) months does not exceed 670 million gallons and distillate throughput loaded into tank trucks for each consecutive twelve (12) months does not exceed 100 million gallons. **[Authority: ARA Permit to Construct No. 003-0309-9-0029 issued on March 29, 2022]**

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	C. The Permittee shall: 1. Prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service to demonstrate compliance with the leak detection requirements under 40 CFR §63.11089. If the Permittee elects to implement an instrument program under §63.11089, the record shall include a full description of the program. **[Authority: 40 CFR §63.11094(d)]** 2. Use a logbook to record the required monthly leak inspections. The logbook shall be signed by the Permittee at the completion of each inspection. A section of the logbook shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. **[Authority: 40 CFR §63.11089(b)]** 3. Record each detection of a liquid or vapor leak in the logbook. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except if there is a delay of repair. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR §63.11089(c) and (d)]** The Permittee shall record in the logbook for each leak that is detected the following information: **[Authority: 40 CFR §63.11094(e)]** (a) The equipment type and identification number. (b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). (c) The date the leak was detected, the date of each attempt to repair the leak, and reasons for any repair interval in excess of fifteen (15) days.

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	(d) Repair methods applied in each attempt to repair the leak. (e) The expected date of successful repair of the leak if the leak is not repaired within 15 days. (f) The date of successful repair of the leak. 4. Maintain records of the following for at least five (5) years and shall make available to the Department upon request: (a) Records of the occurrence and duration of each malfunction of operation of the process equipment or the air pollution control and monitoring equipment. **[Authority: 40 CFR §63.11094(g)(1)]** (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore manufacturing process and air pollution control and monitoring equipment to its normal or usual manner of operation. **[Authority: 40 CFR §63.11094(g)(2)]**
6.5	**Reporting Requirements:** HAP and VOC Emissions Limitations A. The Permittee shall submit to the Department, as part of the annual Emission Certification that is submitted to the Department by April 1 of each calendar year, facility wide HAP emissions and annual HAP content test results or HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.02.19C, 19D, and COMAR 26.11.03.06]** B. The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06]** C. The Permittee shall:

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	1. Submit notifications specified in 40 CFR §63.9, as applicable, in accordance with 40 CFR, Part 63, Subpart BBBBBB. **[Authority: 40 CFR §63.11093(d) and 40 CFR §63.9]** 2. Submit an excess emissions report to the Department at the same time the semiannual compliance report is submitted. The excess emissions report shall include the following information: **[Authority: 40 CFR §63.11095(b)]** For each occurrence of an equipment leak for which no repair attempt was made within five (5) days or for which repair was not completed within 15 days after detection: (a) The date on which the leak was detected. (b) The date of each attempt to repair the leak. (c) The reasons for the delay of repair. (d) The date of successful repair. **[Authority: 40 CFR §63.11095(b)(5)]** 3. The Permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period, and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11085(a), including actions taken to correct a malfunction. The report shall be submitted as a part of the semiannual compliance report. The number of equipment leaks not repaired within 15 days after detection shall also be included in the semiannual compliance report. **[Authority: 40 CFR §63.11095(a)(3) and (d)]**

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 1 Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

The No. 2 fuel oil-fired furnace rated at 0.196 million BTU per hour for office building space heat is subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

(d) The visible emissions are not greater than 40 percent opacity; and

(e) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.

(2) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

EU-20: One (1) 550-gallon heating oil, horizontal storage tank.
EU-207L: One (1) 692,352-gallon distillate storage tank equipped with a cone roof.

(3) No. 2 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-8: One (1) 225-gallon sample return tank associated with the butane blending project. Note: this emission unit was

previously a 300-gallon, fuel additive, horizontal storage tank which was replaced by a square storage tank in 2011.

EU-25: One (1) 350-gallon, off-spec/slop, horizontal storage tank.

(4) No. 6 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-7: One (1) 225-gallon, fuel additive, horizontal storage tank.
EU-9: One (1) 2,000-gallon, fuel additive, horizontal storage tank.
EU-13: One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.
EU-14: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-18: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-19: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.

The Permittee shall maintain records of the monthly throughput of fuel additive stored in EU-9. **[Authority: ARA Permit to Construct No. 02-9-0599 issued on November 5, 1997]**

(5) No. 1 The storage of butane, propane, liquefied petroleum, or natural gas.

EU-12: One (1) 60,000-gallon pressurized butane bullet installed in 2011. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.

(6) No. 1 Laboratory fume hoods and vents.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

(1) Applicable Regulations:

A. COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

B. COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

C. COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

(2) Operating, Testing and Monitoring Conditions:

None

(3) Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

A. A statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remains valid.

OR

B. A revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

KINDER MORGAN LIQUIDS TERMINALS LLC
801 EAST ORDNANCE ROAD
BALTIMORE, MARYLAND 21226
PERMIT NO. 24-003-0309
PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

Kinder Morgan Liquids Terminals LLC (Kinder Morgan) operates a bulk petroleum storage and transfer facility located at 801 East Ordnance Road, Baltimore, Maryland, owned by KM Phoenix Holdings LLC. The facility is located in Air Quality Area III, an ozone non-attainment area in Anne Arundel County. The primary standard industrial classification (SIC) code for this terminal is 4226.

The major activities at the facility include warehousing and storage of bulk petroleum products. The terminal receives petroleum products via marine transport vessels and pipeline and distributes petroleum products via transport tank trucks. No gasoline is loaded into barges at this time.

The primary sources of air emissions at the facility include eight (8) bulk petroleum storage tanks, seventeen (17) smaller storage tanks (additive, slop, butane, fuel oil storage, etc.), a five-lane truck loading rack, one (1) carbon adsorption/absorption vapor recovery unit (VRU), and one (1) vapor combustion unit (VCU). Volatile organic compounds (VOCs) emitted during transport tanker truck loading are controlled primarily by the VRU and the VCU for backup control.

The following table summarizes the actual emissions from Kinder Morgan based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2022	0.47	< 1.0	< 1.0	1.17	32.67	1.22
2021	0.63	< 1.0	< 1.0	1.57	37.4	0.19
2020	1.41	< 1.0	< 1.0	3.53	38.94	2.2
2019	2.84	< 1.0	< 1.0	7.1	51.25	2.84
2018	3.1	< 1.0	< 1.0	7.74	45.72	2.53

The major source threshold for triggering Title V permitting requirements in Anne Arundel County is 25 tons per year for VOC, 25 tons for NOx, and 100 tons per year for any other criteria pollutants and 10 tons for a single HAP or 25 tons per year for total HAPs. Since the actual VOC emissions from the facility are greater than the major source threshold, Kinder Morgan is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

GREENHOUSE GAS (GHG) EMISSIONS

Kinder Morgan emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e., space heater, VCU) contained within the facility premises. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. Emission certification reports for the years 2020, 2021, and 2022, showed that Kinder Morgan is a minor source (threshold: 100,000tpy CO_2e) for GHG's (see Table 2 shown below). The Permittee shall quantify facility wide GHG emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from Kinder Morgan based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2022 tpy CO_2e	2021 tpy CO_2e	2020 tpy CO_2e
Carbon dioxide CO_2	1	3906.78	200	1246.84
Methane CH_4	25	0.17	0.01	0.053
Nitrous Oxide N_2O	300	0.033	0.0027	0.01
Total GHG CO_{2eq}		**3920.93**	**201.06**	**1251.16**

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

The following changes have occurred since the last Title V – Part 70 Operating Permit was issued to this facility on August 1, 2019. These changes have been incorporated into the renewal Title V - Part 70 Operating Permit for Kinder Morgan:

- A permit to construct was issued on March 29, 2022, to increase the throughput of gasoline/ethanol at the loading rack to 670 million gallons. Kinder Morgan requested stricter emissions limits on the VRU and VCU in order to increase the throughput. The VOC emissions limit of the VRU and VCU was lowered from 10 mg/l to 7 mg/l when loading 108,000 gallons of gasoline per hour. In addition, the fugitive emissions factor was lowered to 8 mg/l by requiring that the Permittee may not allow a gasoline or VOC tank truck to be filled or emptied unless the tank has been certified annually as capable of sustaining a pressure change of not more than one (1) inch of water (which is equivalent to 8 mg/l of

gasoline or VOC loaded) in five (5) minutes when pressurized to a gauge pressure of 18 inches of water (4,479 kilonewtons/square meter).

- The permit has also been updated to include the incorporation of changes to 40 CFR 60, Subpart Kb. A revision of the rule was issued on January 19, 2021. This revision allows in-service inspections of internal floating roof tanks. The changes were incorporated into Table IV-2, Condition 2.3 B and C(3) and Table IV-1, Condition 1.3 B and C(3).

NSPS AND NESHAP APPLICABILITY

NSPS Applicability

Kinder Morgan operates three (3) refined petroleum storage tanks primarily storing gasoline (EU-213R, EU-217V, and EU-218W) that are subject to 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Each tank has a capacity greater than 75 cubic meters (approximately 19,800 gallons) and each tank was constructed or modified after July 23, 1984. The NSPS requirements of 40 CFR, Part 60, Subpart Kb are included in the Title V – Part 70 Operating Permit for these tanks.

Kinder Morgan is also subject to the requirements of 40 CFR, Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals. Subpart XX applies to loading racks constructed or modified after December 17, 1980. Kinder Morgan's loading rack was constructed in 1989 and is subject to the requirements of Subpart XX. The NSPS requirements of 40 CFR, Part 60, Subpart XX are included in the Title V permit for the loading rack.

No other NSPS regulations apply to Kinder Morgan at this time.

NESHAP Applicability

Kinder Morgan is a synthetic minor source with respect to HAP emissions. HAP emission limits and other operating limits are included in the Title V – Part 70 Operating permit. As a synthetic minor source, Kinder Morgan is not subject to the major source NESHAP requirements of 40 CFR, Part 63, Subpart R for Gasoline Distribution Facilities.

Kinder Morgan is subject to the requirements of the area source NESHAP, 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. The NESHAP requirements of 40 CFR, Part 63, Subpart BBBBBB are included in this Title V – Part 70 Operating permit renewal.

No other NESHAP regulations apply to Kinder Morgan at this time.

CAM APPLICABILITY

Compliance Assurance Monitoring (CAM), as specified in 40 CFR, Part 64, applies to any emission unit at a Title V major source that meets all of the following criteria:

The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant.

(1) The emission unit uses a control device to achieve compliance with any such emission limitation or standard.

(2) The emission unit has the potential to emit pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source and must not otherwise be exempt from CAM.

The storage vessels at Kinder Morgan do not employ control devices as defined in 40 CFR §64.1. CAM requirements do not apply to the storage vessels.

The loading rack at Kinder Morgan uses a VRU and a VCU to meet federally enforceable emission limits (COMAR 26.11.13.04A(1)(a) and 40 CFR §60.502(a) and (b)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. A CAM plan is not required for the VRU because the use of a CEMS satisfies the requirements of 40 CFR, Part 64. A CAM plan is required for the VCU and is included in Table IV-5 CAM Plan of the renewal Title V – Part 70 Operating Permit.

COMPLIANCE UPDATE

A full compliance evaluation of the facility was conducted on January 19, 2023. This evaluation included the review of all required recordkeeping. Notably, stack testing was completed within the required timeframe and the results were in compliance with the standards. It was documented that the facility installed a new CEMS capable of measuring non methane hydrocarbons in December of 2020. The full compliance evaluation report states that tank inspections and maintenance were performed accordingly. A back pressure reading of the truck loading rack was also taken during the inspection and all trucks at the terminal were inspected for compliance with the vapor tightness test. No violations were observed at the time of the evaluation and a review of the records over the last 5 years indicates that the Air and Radiation Administration has not issued any Notices of Violation or taken any enforcement action against the company.

EMISSION UNIT IDENTIFICATION

Kinder Morgan has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

Table 3: Emission Unit Identification (ARA Registration No. 003-0309-9-0029)

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-207L	One (1) 692,352-gallon distillate storage tank equipped with a cone roof.	1969
EU-208M	One (1) 2,989,014-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1926, modified in 2018 for IFR replacement.
EU-212Q	One (1) 3,267,905-gallon, gasoline storage swing tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.	1961
EU-213R	One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1995
EU-214S	One (1) 3,248,243-gallon, gasoline or Naphtha storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.	1929, modified in 2017 for Naphtha storage.
EU-215T	One (1) 2,776,821-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1930
EU-217V	One (1) 2,995,855-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.	1930, modified in 1998 for gasoline service.
EU-218W	One (1) 2,942,597-gallon ethanol storage tank equipped with an internal floating roof (with a fixed cone roof) with a mechanical shoe primary seal and a secondary wiper seal.	1931, modified in 2006 for ethanol storage and 2017 for IFR replacement.

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-LR	A five-lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.	1989, modified in 2006, 2011, and 2022.
EU-7	One (1) 225-gallon, fuel additive, horizontal storage tank.	2001
EU-8	One (1) 225-gallon sample return tank associated with the butane blending system. Note: this emission unit was previously for one (1) 300-gallon, fuel additive, horizontal storage tank.	2011
EU-9	One (1) 2,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-10	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-11	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-12	One (1) 60,000-gallon pressurized butane bullet. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.	2011
EU-13	One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.	1997
EU-14	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-15	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-16	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-17	One (1) 8,200-gallon, fuel additive, horizontal storage tank.	Unknown
EU-18	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-19	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-20	One (1) 550-gallon, heating oil, horizontal storage tank.	2001
EU-23	One (1) 4,500-gallon, slop refined ethanol, horizontal storage tank.	2006
EU-25	One (1) 350-gallon, off-spec/slop, horizontal storage tank.	Unknown
EU-26	One (1) 4,300-gallon, fuel additive, horizontal storage tank.	2004

Note: EU-7, 8, 9, 12, 13, 14, 18, 19, 20, 25, and 207L are listed in the insignificant activities section.

AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate

to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Gasoline Storage Tanks – Emission Units EU-208M, 212Q, 214S, and 215T

Kinder Morgan maintains four (4) refined petroleum storage tanks (EU-208M, 212Q, 214S, and 215T). These emission units are large (greater than 40,000 gallons) closed-top, petroleum storage tanks with internal floating roofs equipped with primary and secondary seals. These tanks are currently used to store gasoline. In addition to gasoline, these tanks are permitted to store distillate oils and other refined petroleum products.

These tanks are not subject to the requirements of 40 CFR, Part 60, Subpart K, Ka, or Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) because they were not constructed, reconstructed, or modified after July 11, 1973. All of these tanks were constructed prior 1970 and have not undergone any major modifications or reconstructions as defined in 40 CFR Part §60.14 and §60.15 at this time. These storage tanks are subject to the requirements of COMAR 26.11.13, Control of Gasoline and Volatile Organic Compound Storage and Handling and to the requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. In most cases, the requirements of 40 CFR, Part 63, Subpart BBBBBB reference the requirements of 40 CFR, Part 60, Subpart Kb as applicable standards.

The following is a description of the storage tanks included in Table IV-1 of the Part 70 Operating Permit.

EU-208M: One (1) 2,989,014-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. On 5/9/17 a permit to construct was issued for the installation of a replacement IFR.

EU-212Q: One (1) 3,267,905-gallon, gasoline storage swing tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal.

EU-214S: One (1) 3,248,243-gallon, gasoline or Naphtha storage tank equipped with an internal floating roof (originally an external floating roof now

covered with a geodesic dome which, as a system, acts as an internal floating roof) with a mechanical shoe primary seal and a secondary wiper seal. Naphtha storage was included in Dec. 2017

EU-215T: One (1) 2,776,821 -gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal.

As mentioned above, Tanks EU-212Q and EU-214S were originally equipped with an external floating roof and then geodesic domes were installed at a later date above the floating roofs. Since the installation of the geodesic domes, the tanks are regulated as being equipped with internal floating roofs.

Applicable Standards for Control of VOC and HAP

A. Each of the four (4) storage tanks are subject to COMAR 26.11.13.03A(1)(a), which requires that each tank's gauging and sampling devices be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]**

B. In accordance with COMAR 26.11.13.03A(1)(b), each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]**

C. Each of the four (4) storage tanks are subject to COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements:

1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]**

2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]**

3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than $^{1}/_{8}$ inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]**

D. The Permittee shall equip each of the four storage vessels with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i), §60.112b(a)(1)(ii)(A), §60.112b(a)(1)(ii)(C), and §60.112b(a)(1)(iii). This also satisfies the requirements of COMAR

26.11.13.03A(1)(b). **[Authority: 40 CFR §60.112b(a)(1), §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]**

Compliance Demonstration

To comply with the requirements of COMAR 26.11.13.03A(1)(a), the Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired, or the tank will be emptied as soon as possible.

Each of the four (4) storage tanks is equipped with an internal floating roof with a primary and secondary seal to comply with the requirements of COMAR 26.11.13.03A(1)(b). To comply with the seal requirements of COMAR 26.11.13.03A(2) and 40 CFR, Part 63, Subpart BBBBBB, the Permittee shall visually inspect the internal floating roof and the seals of each tank prior to filling and refilling the tank with volatile organic liquid, as specified in 40 CFR §60.113b(a)(1). In accordance with 40 CFR §63.11087(c) and 40 CFR §63.11092(e)(1), the Permittee shall also perform an annual visual inspection of the roof and seals of each tank, as specified in COMAR 26.11.13.03A(3) and 40 CFR §60.113b(a)(2).

The Permittee is also required to perform an internal inspection of each tank at least every ten (10) years, as specified in 40 CFR §60.113b(a)(4) or when an annual visual inspection shows non-compliance.

To demonstrate compliance with the seal gap requirements of COMAR 26.11.13.03A(2)(c), the Permittee shall use the procedures in COMAR 26.11.13.03A(4) during each internal tank inspection.

In accordance with 40 CFR §63.11087(e), §63.11094(a), and §63.11095(a)(1), in addition to maintaining inspection and repair records for each tank as specified by 40 CFR §60.113b(a)(1), (2), (3), and (4), and COMAR 26.11.13.03A(3), the Permittee shall also maintain the average monthly storage temperature and throughput for each tank as specified in COMAR 26.11.13.03C(3), and records of all repairs or replacements of the seals as specified in COMAR 26.11.13.03C(2). The Permittee is required to furnish a report to the Department within 30 days illustrating any defects in the tanks, including the seals and internal roofs, detected

during the required inspections, as well as any repairs made, as required by 40 CFR §60.115b(a)(3) and §60.115b(a)(4).

In accordance with 40 CFR §63.11087(e), 40 CFR §63.11095(a)(1), §63.11095(a)(3), the Permittee is required to submit a semiannual compliance report that includes records of each inspection performed for each of the four (4) storage tanks. The semiannual compliance report shall also include records of any defects in the tanks, including the seals and internal roofs, that are detected during the required inspections, as well as any repairs made as specified by §60.115b(a)(2) and §60.115b(a)(3).

In accordance with 40 CFR §63.11087(c) and 40 CFR §63.11092(e)(1), the Permittee is also required to notify the Department prior to conducting internal inspections to afford the Department the opportunity to have an observer present as specified in 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d).

Rationale for Periodic Monitoring
COMAR 26.11.13 and 40 CFR, Part 63, Subpart BBBBBB outline specific inspection methods and procedures for demonstrating compliance with the roof and seal requirements for each of the four (4) storage tanks. Subpart BBBBBB requires both internal and external inspections periodically (after every fill and refill, every year, and every ten (10) years).

In addition, the Department requires annual inspections of each tank's gauging and sampling devices to demonstrate compliance with the gas-tight device requirement. These inspections are thorough so that if there are any defects they should be detected in a timely manner without the release of significant emissions. Subpart BBBBBB requires that any defects noted in the internal and external inspections are reported to the Department. Subpart BBBBBB requires the submission of semiannual compliance reports detailing records of the required inspections and any noted defects. No additional periodic monitoring is necessary to demonstrate compliance at this time.

Gasoline Storage Tanks – Emission Units EU-213R, EU-217V, and EU-218W
Kinder Morgan maintains three (3) refined petroleum product storage tanks (EU-213R, 217V, and 218W) each equipped with an internal floating roof with primary and secondary seals for the storage of gasoline, distillate fuels, ethanol, or other refined petroleum products. Tanks EU-213R and EU-217V are currently used to store gasoline and Tank EU-218W is currently used to store ethanol.

These three (3) storage tanks are subject to the requirements of 40 CFR, Part 60, Subpart Kb, for volatile organic liquid storage vessels constructed after July 23,

1984. Each tank has a capacity greater than 75 cubic meters (approximately 19,800 gallons) and each tank was constructed or modified after July 23, 1984. These storage tanks are also subject to the requirements of COMAR 26.11.13, Control of Gasoline and Volatile Organic Compound Storage and Handling, and to the requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

In accordance with 40 CFR §63.11087(f), the storage tanks are deemed in compliance with all applicable requirements for storage tanks included in Subpart BBBBBB if the storage tanks comply with the requirements of 40 CFR, Part 60, Subpart Kb. Therefore, there are no Subpart BBBBBB requirements included in the Title V – Part 70 Operating Permit for these tanks.

The following is a description of the storage tanks included in Emission Unit Nos. 213R, 217V, and 218W.

EU-213R: One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. In addition to gasoline, this tank is permitted to store distillate oils and other refined petroleum products. Permit to Construct No. 003-9-0029 was issued on December 5, 1994, for this gasoline storage tank.

EU-217V: One (1) 2,995,855-gallon, gasoline storage tank equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. This tank was originally constructed for distillate service. Permit to Construct No. 003-9-0029 was issued on November 6, 1998, to modify the tank to include an internal floating roof and primary and secondary seals to allow it to be used as a swing tank to store gasoline when another tank is taken out of service for cleaning.

EU-218W: One (1) 2,942,597-gallon, ethanol storage tank equipped with an internal floating roof with primary and secondary seals. This tank previously stored refined petroleum products. A permit to construct was issued on February 3, 2006, for the installation of an internal floating roof, equipped with primary and secondary seals, to convert this tank from distillate oil to ethanol storage. The permit prohibits Kinder Morgan from storing any other material besides ethanol in this tank unless Kinder Morgan applies for and obtains a permit to construct from the Department. This limit exempts the Permittee from the Department's expanded public participation process for the

permit to construct. On 5/9/17 a permit to construct was issued for the installation of a replacement IFR.

Applicable Standards for Control of VOC

A. Each of the three (3) storage tanks are subject to COMAR 26.11.13.03A(1)(a), which requires that the tank's gauging and sampling devices to be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]**

B. In accordance with COMAR 26.11.13.03A(1)(b), each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]**

C. Each of the three (3) storage tanks are subject to COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements:

1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]**

2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]**

3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than $^{1}/_{8}$ inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]**

D. Each of the three (3) storage tanks are subject to the requirements of 40 CFR §60.112b(a)(1), which requires the Permittee to equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i) through (ix). This also satisfies the requirements of COMAR 26.11.13.03A(1)(b) and 26.11.13.03A(2).

Compliance Demonstration

To comply with the requirements of COMAR 26.11.13.03A(1)(a), the Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the

Permittee will take that will assure that the device will be repaired or the tank will be emptied as soon as possible.

Each of the three (3) storage tanks is equipped with an internal floating roof with a primary and secondary seal to comply with the requirements of COMAR 26.11.13.03A(1)(b) and 40 CFR, Part 60, Subpart Kb. To comply with the seal requirements of COMAR 26.11.13.03A(2) and Subpart Kb, the Permittee shall visually inspect the internal floating roof and the seals of each tank prior to filling and refilling the tank with volatile organic liquid, as specified in 40 CFR §60.113b(a)(1). The Permittee shall also perform an annual visual inspection of the roof and seals of each tank, as specified in COMAR 26.11.13.03A(3) and 40 CFR §60.113b(a)(2). The Permittee is also required to perform an internal inspection of each tank at least every ten (10) years, as specified in 40 CFR §60.113b(a)(4) or when an annual visual inspection shows non-compliance.

To demonstrate compliance with the seal gap requirements of COMAR 26.11.13.03A(2)(c), the Permittee shall use the procedures in COMAR 26.11.13.03A(4) during each internal tank inspection. The Permittee shall maintain all records of the inspections and repairs for at least five (5) years and shall make the records available to the Department upon request.

In addition to maintaining inspection and repair records for each tank as specified in 40 CFR §60.113b(a)(1), (2), (3), and (4), and COMAR 26.11.13.03A(3), the Permittee shall also maintain storage tank specification records as specified in 40 CFR §60.116b(a) and (b); records of the materials stored including the maximum true vapor pressure as specified in 40 CFR §60.116b(c); and the average monthly storage temperature and throughput for each tank as specified in COMAR 26.11.13.03C(3).

The Permittee is required to furnish a report to the Department within 30 days illustrating any defects in the tanks including the seals and internal roofs detected during the required inspections as well as any repairs made as required by 40 CFR §60.115b(a)(3) and §60.115b(a)(4). The Permittee is also required to notify the Department prior to conducting internal inspections to afford the Department the opportunity to have an observer present as specified in 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d).

Rationale for Periodic Monitoring Strategy

COMAR 26.11.13 and 40 CFR, Part 60, Subpart Kb outline specific inspection methods and procedures for demonstrating compliance with the roof and seal requirements for each of the three (3) storage tanks. Subpart Kb requires both internal and external inspections periodically (after every fill and refill, every year, and every ten (10) years). In addition, the Department requires annual inspections

of each tank's gauging and sampling devices to demonstrate compliance with the gas-tight device requirement. These inspections are thorough so that if there are any defects they should be detected in a timely manner without the release of significant emissions. Subpart Kb requires that any defects noted in the internal and external inspections are reported to the Department. No additional periodic monitoring is necessary to demonstrate compliance at this time.

Operational Requirement

The Permittee shall not store gasoline in Tank EU-218W unless the Permittee applies for and obtains a permit to construct from the Department. **[Authority: ARA Permit to Construct No. 003-9-0029 issued February 3, 2006]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy

Kinder Morgan is limited to storing ethanol only in storage tank EU-218W in order to be exempt from the Department's expanded public participation process for the Permit to Construct issued on February 3, 2006. The Permittee is already required to keep records of the materials stored in storage tank EU-218W to comply with the requirements of 40 CFR 60, Subpart Kb. These records are sufficient to demonstrate compliance with the ethanol storage limitation. No additional periodic monitoring is required.

Storage Tanks – Emission Units EU-10, EU-11, EU-15, EU-16, EU-17, EU-23, and EU-26

These tanks are not exempt from permit requirements in accordance with COMAR 26.11.02.10Q(8) because these tanks are each greater than 2,000-gallons. These tanks are sources of VOC emissions but are not subject to the large storage tank VOC RACT requirements for VOC storage tanks in COMAR 26.11.13 because the tanks are less than 40,000 gallons and they are not subject to the small gasoline tank VOC RACT requirements in COMAR 26.11.13 because the tanks do not store pure gasoline.

These tanks are also not subject to the requirements of 40 CFR, Part 60, Subpart Kb because these tanks are each less than 19,800 gallons in capacity. The tanks are subject to the general VOC requirements of COMAR 26.11.06.06. The following is a description of these storage tanks.

EU-10: One (1) 8,000-gallon, fuel additive, horizontal storage tank.
EU-11: One (1) 8,000-gallon, fuel additive, horizontal storage tank.
EU-15: One (1) 10,000-gallon, fuel additive, horizontal storage tank.
EU-16: One (1) 10,000-gallon, fuel additive, horizontal storage tank.
EU-17: One (1) 8,200-gallon, fuel additive, horizontal storage tank.
EU-23: One (1) 4,500-gallon, ethanol, horizontal storage tank.
EU-26: One (1) 4,300-gallon, fuel additive, horizontal storage tank.

Applicable Standards for Control of VOC

COMAR 26.11.06.06B(1)(a), which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-15, EU-16, and EU-17.

COMAR 26.11.06.06B(1)(b), which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-10, EU-11, EU-23, and EU-26.

Operational Requirement

The Permittee shall store only additive or other volatile organic liquids that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains approval from the Department. **[Authority: COMAR 26.11.02.09A]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy

General maintenance and repair conducted by the Permittee will ensure that these additive and slop refined ethanol storage tanks are in compliance with the VOC requirements of COMAR 26.11.06.06B(1)(a) or COMAR 26.11.06.06B(1)(b). According to the EPA Tanks 4.0.9d emission estimate program, it is estimated that each tank (with the exception of EU-23) emits less than one (1) pound per day per tank. It is estimated that EU-23 emits 7.0 pounds per day (1.3 tons per year). Standard storage tank preventative maintenance will ensure that the emissions from these tanks remain less than the applicable 20 pounds per day or 200 pounds per day.

To continue to comply with the VOC emissions limitations of COMAR 26.11.06.06, the Permittee shall maintain records of the amounts, types, and composition of all materials loaded into each tank. These records can be used to determine VOC emissions from each tank and are sufficient to demonstrate that each tank will not exceed its applicable VOC emissions limitation. In addition, the Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations”. The Permittee is required to obtain appropriate approval from the Department if the contents of these storage tanks are changed such that these tanks would become subject to more stringent monitoring, testing, record keeping and reporting requirements. No periodic monitoring is required to demonstrate compliance with the applicable standards listed above.

Five Lane Loading Rack - Emission Unit EU-LR

EU-LR is a five (5) lane refined petroleum product loading rack with a John Zink twin carbon bed VRU used for primary control and a John Zink VCU used for back-up control. The loading rack has five (5) lanes with a total of 25 loading arms. Tank trucks are bottom loaded with gasoline, fuel oil, and diesel fuel. The VRU was installed in 1989 (ARA Permit to Construct No. 003-9-0029 issued January 4, 1989) and the VCU was installed in 1993 as a back-up control device (ARA Permit to Construct No. 003-9-0029M issued on July 21, 1993). The VCU operates whenever the VRU is down for repairs. Emissions from the loading rack include fugitive emissions from truck loading and emissions from both the VRU and the VCU. The terminal does not own or operate any of the tank trucks.

A permit to construct was issued on October 3, 2011, to modify the existing loading rack to allow blending butane with gasoline products. The following pieces of equipment were installed for blending butane with gasoline products:

- One (1) 60,000-gallon pressurized butane bullet (EU-12).
- One (1) 225-gallon ethanol day tank containing ethanol denatured with up to 5% gasoline. (EU-7)
- One (1) 225-gallon sample return tank containing a mixture of 90% gasoline and 10% denatured ethanol (EU-8).
- New pumps, valves, and flanges at the loading rack to allow for butane to be blended into gasoline product as trucks are filled at the loading rack.

The butane-blended gasoline will be injected in the vicinity of the loading rack as gasoline and ethanol are being loaded into tank trucks. Kinder Morgan does not store the gasoline/butane mixture in any of the terminal's product storage tanks and does not load pure butane into trucks.

Applicable Standards for Visible Emissions Limitation

COMAR 26.11.06.02C(2), which prohibits visible emissions other than water in an uncombined form. This limitation applies to the VCU only.

Exceptions. **COMAR 26.11.06.02A(2)** establishes that "Section C does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Demonstration (Visible Emissions Limitation)

The VCU is the only emissions source at the facility that may emit visible emissions. To comply with the no visible emissions limitation of COMAR

26.11.06.02C the Permittee shall perform monthly visible emissions observations of the VCU when the VCU is operating for a six (6) minute period. If the VCU does not operate during a month, a record shall be maintained to indicate that no observation was required during that month.

If emissions are visible, the Permittee is required to perform all necessary repairs and continue visible emissions observations until corrective action has achieved compliance with this regulation within 48 hours. After 48 hours, if there are still visible emissions, the Permittee shall take additional remedial actions and perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. The Permittee is required to maintain a log of all visible emissions observations conducted as well as any corrective actions taken. This requirement is part of the Permittee's CAM Plan (Indicator 4) for the John Zink VCU. If incidents of visible emissions are observed which are not allowed under the exceptions to COMAR visible emission regulations, then the Permittee is required under "Report of Excess Emissions and Deviations" Permit Condition 4, Section III to report the incidents.

Rationale for Periodic Monitoring (Visible Emissions Limitation)
Combustion units rarely have visible emissions. Visible emissions from the VCU would only occur if the unit is malfunctioning. Because the VCU is used as a back-up control device to the VRU and operates when the VRU is offline for maintenance (once a week for 8 hours), monthly visible emissions observations are adequate to ensure that the VCU is operated properly. The exhaust gases from the stack of the unit are continuous and a 6-minute observation when the VCU is operating is satisfactory to determine if visible emissions are occurring. The preventive maintenance required by the CAM Plan will be sufficient to ensure that the unit operates as designed and that the unit will not have visible emissions.

Applicable Standards for Control of VOC and HAP (Vapor Collection and Control Requirements)

1. The vapor collection and control system controlling emissions from the loading system shall collect the total organic compounds (TOC) vapors displaced from cargo tanks during product loading and shall control at least 90 percent of all vapors from the loading racks. **[Authority: 40 CFR §60.502(a), COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(a)]**

2. The emissions from the vapor collection and control system shall be limited to 0.058 pounds of TOC per 1,000 gallons (7 milligrams of TOC per liter) of gasoline or VOC loaded. Note: Compliance with this requirement also demonstrates compliance with the requirements of COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), and Table 2 to 40 CFR, Part 63,

Subpart BBBBBB, requirement 1(b). **[Authority: COMAR 26.11.03.06C, COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b), and ARA Permit to Construct No. 003-0309-9-0039 issued March 29, 2022]**

This emissions limitation is equivalent to the following: VOC emissions from the VRU or the VCU when controlling emissions from the loading rack shall be less than 6.5 pounds per hour (based on the emission factor of 7 milligrams of TOC per liter when loading 108,000 gallons of gasoline per hour or 0.058 pounds of TOC per 1000 gallons of gasoline or VOC loaded), unless the Permittee demonstrates to the satisfaction of the Department that the modification to the loading rack to increase throughput is not considered a modification in accordance with the New Source Performance Standards of 40 CFR, Part 60, Subparts A and XX at a higher emission rate. **[Authority: ARA Permit to Construct No. 003-0309-9-0039 issued March 29, 2022]**

Compliance Demonstration (Vapor Collection and Control Requirements)

To comply with the requirements of COMAR 26.11.13.04A(1)(a), 40 CFR §60.502(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB the loading operations are controlled by a VRU equipped with a CEMS as the primary control device and a VCU as back-up control. The Permittee must perform semiannual preventative maintenance on the VRU and operate and maintain the CEMS in accordance with a quality control plan to ensure proper operation as specified in 40 CFR, Part 63, Subpart A. The CEMS is a compliance option under 40 CFR, Part 63, Subpart BBBBBB. To demonstrate continuous compliance with the 10 milligrams per liter of gasoline loaded requirement (which will also demonstrate compliance with the 35 milligrams per liter of gasoline loaded requirement) and the required 90% control efficiency, the Permittee shall conduct performance tests on the VRU and the VCU to determine the mass emission rate at least once every five (5) years.

The Permittee shall submit a test protocol to the Department for review and approval and shall submit the test results to the Department.

When the VCU is used as the control device for the loading rack, the Permittee shall monitor the VCU for the presence of a pilot flame and operate the VCU in accordance with the monitoring and inspection plan specified in 40 CFR, Part 63, Subpart BBBBBB. The Permittee shall also conduct preventative maintenance at least two (2) times per year on the VCU as specified in the CAM Plan for the VCU. The Permittee is required to operate the VCU within the bounds of the CAM Plan included in Table IV-5 of the Title V – Part 70 Operating permit and within the bounds of the operating parameters established in the last performance test. Operating the vapor processing system beyond the bounds of the determined

operating parameters will constitute a violation unless corrective actions as described in the monitoring and inspection plan are followed.

The Permittee is also required to keep records of all maintenance and repairs performed, including all replacements or additions of components, on the VRU and VCU. The Permittee shall also maintain records of all mass emission rate performance tests and records of all preventative maintenance performed as required by the CAM Plan. Records of the continuous monitoring data required under 40 CFR §63.11092(b) indicating the time intervals during the loadings of gasoline cargo tanks or the operating parameter data during loadings. These records will ensure that the VRU and the VCU are maintained to perform as designed.

The Permittee is to report all deviations from the CAM Plan for the VCU and all malfunctions records for the VRU and VCU to the Department. The Permittee is also required to submit an excess emissions report to the Department as a part of the semiannual compliance report.

Explanation of emissions limitation
In order to maintain synthetic minor status with respect to HAP emissions and to be recognized as a synthetic minor source for the MACT requirements of 40 CFR, Part 63, Subpart R, National Emissions Standards for Gasoline Distribution Facilities, the Permittee has accepted an emission limitation of 7 milligrams of VOC per liter of gasoline loaded which is more stringent than the 35 milligrams per liter requirement included in COMAR 26.11.13.04A(1)(a)(i) and 40 CFR §60.502(b).

The modification to the loading rack to allow butane blending in October of 2011 was not considered a modification with respect to 40 CFR, Part 60, Subpart A and XX because the potential hourly emission rate did not increase as a result of the modification. It was determined when Permit to Construct No. 003-0309-9-0029 was issued on October 3, 2011, that the emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions immediately before the change to potential hourly emissions after the change. It was also determined that the previous owner was not subject to the non-attainment NSR requirements because the emissions increase as a result of the modification were estimated as less than 25 tons per year based on the gasoline throughput limitation of 560 million gallons per year (included in Facility Wide Requirements section below and Table 6 of the Title V – Part 70 Operating Permit) and the conservative emission factor of 10 mg/L of gasoline loaded.

In 2022 Kinder Morgan received a permit to construct to increase their throughput of gasoline/ethanol to 670 million gallons. Kinder Morgan requested stricter emissions limits on the VRU and VCU in order to increase the throughput. The

Department determined that lowering the VOC emissions limit of the VRU and VCU from 10 mg/l to 7 mg/l and increasing the gasoline/ethanol throughput to 670 million gallons would result in no increase in VOC and air toxics emissions under these conditions. The emission limit changes are not considered a modification with respect to 40 CFR, Part 60, Subpart A and XX because the potential hourly emission rate will not increase as a result of the modification. Kinder Morgan's potential hourly emission rate from the loading rack is 6.26 pounds per hour. An emission rate limitation is included in the permit in order to ensure that the proposed modification does not cause a modification to Subpart XX.

This emission rate is based on an established conservative emission factor of 7 mg/L of gasoline loaded or 0.058 lbs. of VOC emitted per 1,000-gallons of gasoline loaded. Kinder Morgan estimates their present potential emissions based on 7 mg/L even though their actual hourly emissions are much less based on stack testing data and CEMS monitoring.

To demonstrate continuous compliance with the 7 milligrams of VOC per liter of gasoline loaded requirement, the Permittee shall conduct performance tests to determine mass emission rate once every five (5) years and conduct preventative maintenance on the VRU and the VCU.

Rationale for Periodic Monitoring (Vapor Collection and Control Requirements)
The VRU and the VCU are designed to meet all applicable VOC control efficiency and emission limitation requirements. The most recent performance test on the VRU was conducted on June 8, 2022, and the most recent performance test on the VCU was conducted on June 9, 2022. An emission rate of 6.1 mg/liter of gasoline loaded was reported for the VCU and 1.51 mg/liter gasoline loaded was reported for the VRU. The performance tests demonstrated that the VOC emissions from the truck loading rack were less than the 7 milligrams per liter of gasoline loaded and the VOC control efficiency of each unit was greater than 98%.

During the performance testing the CEMs for the VRU had a relative accuracy of 1.33% and a seven-day calibration drift of 0.82%. In addition, the limit at which the plant will be shut down was lowered from 0.7% to 0.46% propane, which is reportedly equivalent to 6.51 mg/liter.

Periodic performance testing, the use of a CEMS, operation of a Terminal Management System, and proper preventative maintenance of the VRU and the VCU will ensure that the units are operated as designed.

The use of a CEMS for the VRU is a continuous monitoring strategy and does not require any additional periodic monitoring for compliance with the requirements. The VCU is monitored through a required periodic monitoring and inspection plan

and the CAM Plan. Corrective actions are required for excursions from established operating parameters established during the most recent performance tests.

Applicable Standards for Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR, Part 60, Subpart XX, §60.502(e) through (j). **[Authority: 40 CFR §63.11088(a) and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(d)]**

The Permittee may not allow a gasoline or VOC tank truck to be filled or emptied unless the tank has been certified annually as capable of sustaining a pressure change of not more than one (1) inch of water in five (5) minutes when pressurized to a gauge pressure of 18 inches of water (4,479 kilonewtons/square meter), or evacuated to a gauge pressure of six (6) inches of water (1,493 kilonewtons/square meter) during a test according to the procedure referenced in COMAR 26.11.13.05B(2). The Permittee shall complete any needed repairs, and retest within 15 days of the original test date. **[Authority: 40 CFR §60.502(e) and COMAR 26.11.13.05A and B]**

Compliance Demonstration (Vapor Tight Tank Truck Requirements)

To comply with the gasoline tank truck leak requirements of COMAR 26.11.13.05A and 40 CFR §60.502(e), the Permittee shall ensure that loadings of gasoline or VOC into tank trucks are limited to vapor-tight gasoline tank trucks by obtaining vapor tightness documentation for each gasoline or VOC tank truck that is to be loaded at the facility. The Permittee shall verify that each gasoline tank truck loaded at the facility is a tank truck that has obtained the appropriate vapor tightness documentation within two (2) weeks after the tank truck is loaded. The Permittee shall ensure that a nonvapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.

The Permittee shall keep records of each tank truck's vapor tightness documentation, annual certification testing performed in accordance with 40 CFR §63.11092(f)(1), and documentation of all notifications for non-vapor-tight tank trucks. As an alternative to maintaining records of each gasoline or VOC cargo tank test results at the terminal, the Permittee may have an electronic copy of each record instantly available at the terminal or the Permittee may use a terminal automation system to prevent gasoline or VOC cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system).

The Permittee shall notify the owner or operator of each non-vapor-tight gasoline or VOC tank truck loaded at the facility within one (1) week of the documentation cross-check or three (3) weeks after the loading has occurred and shall submit to the Department copies of certification test records from the leak-tight conditions tests required under COMAR 26.11.13.04A(3)(a). The Permittee is also required to submit to the Department semiannual compliance reports that include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained.

Rationale for Periodic Monitoring (Vapor Tight Tank Truck Requirements)

COMAR 26.11.13, 40 CFR, Part 60, Subpart XX, and 40 CFR, Part 63, Subpart BBBBBB outline specific methods and procedures for demonstrating compliance with the vapor tight tank truck requirements. No additional periodic monitoring is necessary to demonstrate compliance. Kinder Morgan's loading rack is equipped with an interlock system, which prevents drivers with expired vapor certifications from loading until the terminal has received updated certification.

Applicable Standards for Control of VOC and HAP (Back Pressure and Leak Requirements)

The vapor collection and control system and the liquid loading equipment shall be operated such that:

1. The exhaust gases from the loading rack shall vent through the VRU or the VCU prior to discharging to the atmosphere. **[Authority: COMAR 26.11.03.06C]**

2. The gauge pressure in the delivery tank shall not exceed 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR §60.503(d). **[Authority: 40 CFR §60.502(h) and §60.503(d)]**

3. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection and control system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **[Authority: 40 CFR §60.502(i)]**

4. During loading, the gasoline or VOC tank truck pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water. **[Authority: COMAR 26.11.13.04A(1)(b)(i)]**

5. There are no gasoline or VOC leaks in the system when tested by the method referenced in COMAR 26.11.13.04A(3)(a) during loading or unloading operations. **[Authority: COMAR 26.11.13.04A(1)(b)(ii)]**

Compliance Demonstration (Back Pressure and Leak Requirements)

To comply with the requirements of COMAR 26.11.13.04A(1)(b)(i) and (ii), 40 CFR §60.502(h), and 40 CFR §60.502(i) the Permittee shall conduct monthly checks on the back pressure and shall conduct monthly leak inspections of all components related to the loading rack operations during the loading of tank trucks as specified in the CAM Plan (Indicator 1 and 2) for the VCU and 40 CFR §60.502(j) for the VRU and the VCU. The Permittee shall conduct testing for leak-tight conditions as specified by COMAR 26.11.13.04A(3)(a).

The Permittee is required to perform monthly leak inspections of all equipment in gasoline service as specified in 40 CFR §63.11089(a). The Permittee shall also record all equipment in gasoline service inspected and any leaks discovered in a logbook. The Permittee is required to repair the leak within specified time frames and shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason why a repair was not feasible and the date a repair was made. The number of equipment leaks not repaired within 15 days after detection is required to be included in the semiannual compliance report which is submitted with the semiannual monitoring report. The Permittee shall also maintain monthly records of the back pressure readings in the vapor collection system during the loading of tank trucks during a period of maximum product flow. The Permittee shall maintain these records for at least five (5) years as required by the CAM Plan and shall report all deviations from the CAM Plan requirements with the semiannual monitoring report.

Rationale for Periodic Monitoring (Back Pressure and Leak Requirements)

The VRU, VCU, and the loading rack are designed to meet the applicable pressure requirements. In addition, the VRU, VCU, and the loading rack are designed to be leak-tight during loading. Monthly back pressure and leak checks during loading are sufficient to demonstrate compliance with the requirements. All equipment in gasoline service is required to be identified and all equipment leaks are to be documented and repaired within a specified time frame. If leaks are not repaired within 15 days, the Department is notified.

Applicable Standards for Control of VOC and HAP (Design and Operational Requirements)

1. The vapor collection system shall prevent any total organic compound vapors collected at one loading rack from passing to another loading rack or lane to the atmosphere. **[Authority: 40 CFR §60.502(d), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c)]**

2. The Permittee shall assure that loadings of gasoline or VOC tank trucks are made only into tanks equipped with vapor collection equipment that is

compatible with the terminal's vapor collection system. **[Authority: 40 CFR §60.502(f)]**

3. The Permittee shall assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline or VOC tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. **[Authority: 40 CFR §60.502(g)]**

4. The Permittee shall maintain a top submerged or bottom loading system on the terminal's loading racks. **[Authority: COMAR 26.11.13.04A(1)(c)]**

Compliance Demonstration and Rationale for Periodic Monitoring (Design and Operational Requirements)
The VRU, the VCU, and the loading rack are designed to meet the requirements of 40 CFR §60.502(d), (f), and (g), 40 CFR §63.11088(a), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c), and COMAR 26.11.13.04A(1)(c). Even though the previous owner has already demonstrated compliance with the design standards at the time of construction, Kinder Morgan shall operate the system such that the terminal remains in compliance with these standards. Because compliance with these requirements has already been demonstrated there are no monitoring, testing, record keeping, or reporting requirements associated with these standards.

Operational Limitations
The Permittee shall only load ethanol from the fifth lane of the loading rack unless prior approval is obtained from the Department to load other materials. **[Authority: ARA Permit to Construct No. 003-0309-9-0029 issued on March 29, 2022]**

Compliance Demonstration and Rationale for Periodic Monitoring (Operational Limitations)
A permit to construct was issued on April 11, 2006, to modify the existing loading rack with the addition of one (1) ethanol truck loading area (the fifth lane). The previous owner elected to limit the loading to only include ethanol and to exclude any other materials in order to be exempt from the Department's expanded public participation process. Kinder Morgan is required to maintain records of the types and amounts of materials loaded in the four (4) lanes of the loading rack loading gasoline and distillate products, and the fifth lane of the loading rack loading only ethanol. Requiring Kinder Morgan to maintain monthly records of the types and amounts of materials loaded at the loading rack is sufficient to ensure that only ethanol is loaded in the fifth lane.

Overview of the CAM Plan

The loading rack at Kinder Morgan uses a John Zink VRU equipped with a continuous emission monitoring system (CEMS) for primary control and a John Zink VCU as back-up control to meet the applicable federally enforceable emission limits of COMAR 26.11.13.04A(1)(a) and 40 CFR §60.502(a) and (b). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. A CAM plan is not required for the VRU because the use of a CEMS satisfies the requirements of 40 CFR, Part 64. A CAM plan is required for the VCU and is included in Table IV-5 CAM Plan of the Title V – Part 70 Operating Permit renewal.

Both the VRU and the VCU currently meet the permitted emissions limit of 10 milligrams of VOC vented per liter of gasoline loaded at the loading rack. The VCU is checked weekly and used when the primary unit, the VRU, is shutdown for either malfunction or maintenance.

The performance indicators were selected to ensure a reasonable level of assurance that the emissions of VOC from the loading of gasoline and other petroleum products at the truck loading rack will comply with the emissions limitation of 7 milligrams per liter of gasoline loaded. During the compliance tests to demonstrate compliance with the VOC emissions limits, the vapor collection system is checked for leaks and back pressure. The Permittee performs preventative maintenance as required by Subpart BBBBBB on the VCU, and routine maintenance of the vapor collection system to ensure that the VCU and the vapor collection system continue to perform as designed.

Rationale for Selection of Performance Indicators in the CAM Plan

1. Indicator No. 1 - Vapor Line Back Pressure
   The terminal operations maintenance personnel will conduct monthly checks of the back pressure in the collection system. An excursion is defined as when the pressure gauge indicates 18” of water or greater and truck loading is still occurring. Excessive backpressure can cause relief valves to discharge and increase fugitive emissions from leaks in the collection system.

2. Indicator No. 2 - Equipment leaks
   Terminal operations personnel trained on the procedures to detect, record, and initiate corrective actions shall conduct a monthly leak check of the entire vapor collection system during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks.

   Leaks of gasoline and gasoline vapors are readily detected by a person by use of sight, sound, and smell. This requirement included in the CAM Plan also

satisfies the requirement of 40 CFR §60.502(j) of Standards of Performance for Bulk Gasoline Terminals, Subpart XX. This will document that the vapor collection system is free of leaks as it was during the compliance tests.

3. Indicator No. 3 - Presence of a flame within the stack of the VCU
   The pilot detector continuously monitors for the presence of a flame. If the pilot light is present, the combustors will ignite, and combustion will occur. Unless a pilot flame is detected, vapors cannot be introduced into the VCU. If no pilot flame is detected, the VCU cannot start-up. Detection of flame failure during operation will shut down the VCU and will automatically shutdown the loading operations. The pilot detector is connected to an interlock system that ensures that the VCU and the loading rack cannot operate if no flame is detected. In addition, preventative maintenance is performed three times a year to ensure that the VCU continues to operate as designed.

4. Indicator No. 4 – Visible emissions observations of the exhaust gases from the VCU stack
   Visible emissions observations will be conducted monthly to detect visible emissions just above the exhaust outlet of the VCU. The observers shall be trained on procedures in making an observation, shall be trained on procedures necessary for record keeping requirements, and shall be familiar with the maintenance and operation of the VCU. The dampers on air assist blowers are set in a manner that the gasoline vapors will combust smoke-free. Any visible emissions will indicate that the damper settings have malfunctioned.

The following tables contain the CAM Plan for the VCU that is included in Table IV-5 of the renewed Title V – Part 70 Operating Permit.

TABLE IV-5 CAM PLAN
FOR THE VAPOR COMBUSTION UNIT (VCU)

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 1**
I. Indicator 64.4(a)(1)	Vapor Line Back Pressure
Monitoring Approach	Pressure Gauge
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as anytime the pressure gauge indicates greater than 18” of water and truck loading is still occurring. All pressure gauge readings greater than 18” water column shall be

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 1**
	reported to the MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The back pressure is monitored using a portable pressure gauge which is placed on the vapor hose connection to the tanker truck.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. AQ/QC Practices and Criteria	Preventative maintenance is performed on the back pressure gauge two times per year. The back pressure gauge is calibrated or replaced at least once every five (5) years during the VRU performance test.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly visual reading with manual log entry.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 2**
I. Indicator 64.4(a)(1)	Equipment Leaks
Monitoring Approach	Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline will be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days.

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 2**
	All excursions and corrective actions taken shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection Procedures	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit--VCU	**Indicator No. 3**
I. Indicator 64.4(a)(1)	Presence of flame within the VCU stack.
Monitoring Approach	Pilot (flame) detector
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit--VCU	**Indicator No. 3**
	start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU and loading rack cannot operate if no flame is detected.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on the VCU two times per year. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot gas strainer. • Pull and clean assist gas strainer. • Check all indicator lights and sensors, replace if faulty. • Inspect spark ignition systems. • Ensure burner scanner is operating properly by blocking scanner and starting unit. Unit should shut down upon pilot flame failure. • Complete start-up procedure is checked.
D. Monitoring Frequency	Pilot detector operates continuously.
E. Data Collection Procedures	Results of inspections and preventative maintenance of the pilot operation are manually recorded and maintained on site.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit - VCU	**Indicator No. 4**
I. Indicator 64.4(a)(1)	Visible emissions observations during loading operation.

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit - VCU	**Indicator No. 4**
Monitoring Approach	Conduct visible emissions observations.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and record keeping requirements.
D. Monitoring Frequency	At least once per month, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 6-minute period.
E. Data Collection Procedures	Results of observations will be manually recorded and maintained on site. Records will include date, time, and results of the observation.
F. Averaging Period	N/A

Facility Wide Requirements

HAP Emissions Limitations

The major source threshold for HAPs is 10 tons per year for any single HAP or 25 tons per year for a total combination of HAPs. The facility wide HAP emissions limitations cover emissions from the loading and storage of all fuels at the facility. The following limitations are included in the Title V – Part 70 Operating Permit to ensure that the Permittee's total emissions will not exceed the major source thresholds for HAPs and to ensure that the non-attainment NSR requirements do not apply to the March 2022 modification to increase gasoline/ethanol throughput.

1. Facility wide HAP emissions shall be less than10 tons for any single HAP and 25 tons for the total combination of all HAPs in any consecutive twelve (12) month period. **[Authority: COMAR 26.11.03.06C]**

2. Total gasoline/ethanol throughput shall not exceed 670 million gallons in any consecutive twelve (12) month period and distillate throughput shall not exceed 100 million gallons in any consecutive twelve (12) month period, unless the Permittee demonstrates to the satisfaction of the Department, that non-attainment NSR requirements do not apply to the modification to the loading rack to allow blending butane with gasoline products. **[Authority: ARA Permit to Construct No. 003-0309-9-0029 issued on March 29, 2022]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for Facility Wide Requirements

To demonstrate compliance with the HAP emissions limits, the Permittee shall, at least once per year, test or have the fuel supplier test all fuels for HAP content including individual HAP speciation amounts. In lieu of the annual testing requirement, the Permittee may demonstrate compliance with the facility wide HAP emissions limitations through the use of HAP content documentation and/or test data provided by the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. The Permittee shall maintain records to support the calculation of HAP emissions including HAP content documentation and/or test data for each consecutive twelve (12) month period. The Permittee shall submit these records as part of the Annual Emissions Certification that is submitted to the Department each calendar year.

To ensure that non-attainment NSR requirements do not apply to the modification to the loading rack allowing butane blending with gasoline products, Kinder Morgan is subject to a gasoline/ethanol throughput limit of 670 million gallons in any consecutive twelve (12) month period and the distillate throughput limit of 100 million gallons in any consecutive twelve (12) month period. These throughput limitations also ensure that the facility will remain a synthetic minor source for HAP emissions and the facility will be recognized as a synthetic minor source for the

MACT requirements of 40 CFR, Part 63, Subpart R, National Emissions Standards for Gasoline Distribution Facilities.

Kinder Morgan is required to maintain monthly records to document the total gasoline/ethanol throughput and distillate throughput loaded into tank trucks for each consecutive twelve (12) month period. If Kinder Morgan exceeds these throughput limitations, Kinder Morgan is required to report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

Applicable Standards for Control of VOC and HAP

The facility is subject to the general equipment leak requirements of 40 CFR §63.11089 included in 40 CFR, Part 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

The Permittee shall, at all times, operate and maintain any affected source including associated air pollution control equipment and monitoring equipment subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**

Compliance Demonstration

The Permittee is required to perform monthly leak inspections of all equipment in gasoline service in accordance with 40 CFR §63.11089(a), and record in a log book the location of all potential leaks, the required monthly leak inspections, and detections of any leaks. A detailed description for each leak detected is required to be included in the log book. The Permittee is required to repair or replace the leaking equipment within 15 calendar days after detection of each leak. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days provided the Permittee reports why the repair is not feasible and the date that each repair was completed. The Permittee must record in the log book for any leak not repaired within 15 days, the expected date of successful repair and the date of the successful leak repair.

Kinder Morgan is also required to maintain records of any malfunction of operation of the process equipment or control equipment at the facility and any corrective actions taken. The records shall also include actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a).

Kinder Morgan is required to submit an excess emissions report that includes leak information and a semiannual report including the malfunctions that occurred during the reporting period and any corrective actions taken. The semiannual report and excess emissions report are to be submitted with the semiannual compliance report. The semiannual compliance report shall also include the number of leaks not repaired within 15 days of detection.

Rationale for Periodic Monitoring Strategy

Kinder Morgan is required to log detailed information about leak inspections and any leak detected in a log book and is required to submit information to the Department regarding any equipment malfunction. Kinder Morgan is also required to submit information regarding any excess emissions in a semiannual report. It is unlikely that there will be significant leaks at the facility, but in the event that there is a leak, it is required to be repaired within 15 days unless there is a delay of repair. All leak repairs that are delayed are required to be documented including the successful repair date. No additional periodic monitoring is required to demonstrate compliance with the leak requirements of 40 CFR, Part 63, Subpart BBBBBB.

COMPLIANCE SCHEDULE

Kinder Morgan is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

The Acid Rain Program does not apply to Kinder Morgan.

TITLE VI – OZONE DEPLETING SUBSTANCES

Kinder Morgan is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

Kinder Morgan is subject to the requirements of Section 112(r). A Risk Management Plan has been submitted.

PERMIT SHIELD

Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 1 Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

The No. 2 fuel oil fired furnace rated at 0.196 million BTU per hour for office building space heat is subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

(a) The visible emissions are not greater than 40 percent opacity; and

(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.

(2) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

EU-20: One (1) 550-gallon heating oil, horizontal storage tank.
EU-207L: One (1) 692,352-gallon distillate storage tank equipped with a cone roof.

(3) No. 2 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-8: One (1) 225-gallon sample return tank associated with the butane blending project. Note: this emission unit was

previously a 300-gallon, fuel additive, horizontal storage tank which was replaced by a square storage tank in 2011.

EU-25: One (1) 350-gallon, off-spec/slop, horizontal storage tank.

(4) No. 6 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-7: One (1) 225-gallon, fuel additive, horizontal storage tank.
EU-9: One (1) 2,000-gallon, fuel additive, horizontal storage tank.
EU-13: One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.
EU-14: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-18: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-19: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.

The Permittee shall maintain records of the monthly throughput of fuel additive stored in EU-9. **[Authority: ARA Permit to Construct No. 02-9-0599 issued on November 5, 1997]**

(5) No. 1 The storage of butane, propane, liquefied petroleum, or natural gas.

EU-12: One (1) 60,000-gallon pressurized butane bullet installed in 2011. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.

(6) No. 1 Laboratory fume hoods and vents.

STATE ONLY ENFORCEABLE REQUIREMENTS

This section of the permit contains state-only enforceable requirements. The requirements in this section will not be enforced by the U.S. Environmental Protection Agency. The requirements in this section are not subject to COMAR 26.11.03 10 - Public Petitions for Review to EPA Regarding Part 70 Permits.

The Permittee is subject to the following State-only enforceable requirements:

(1) Applicable Regulations:

A. COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

B. COMAR 26.11.15.05, which requires that the Permittee implement “Best Available Control Technology for Toxics” (T–BACT) to control emissions of toxic air pollutants.

C. COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health.

(2) Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee’s facility during the previous calendar year. The analysis shall include either:

A. statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid.

OR

B. a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

December 18, 2023

Janay Mendez
Regulatory & Compliance Engineer
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 715
Baltimore, MD 21230
Via Email: mde.submit-airpermits@maryland.gov

Re: Kinder Morgan Liquids Terminals, LLC – Curtis Bay Terminal
Title V Permit Application – 24-003-0329

Dear Ms. Mendez:

Kinder Morgan Liquids Terminals, LLC, owns and operates the petroleum bulk storage and distribution facility located at 801 East Ordnance Road in Curtis Bay. The facility is operated under Part 70 Operating Permit Number 24-003-0309. Enclosed please find two copies of our permit renewal application. In addition, an electronic copy has been sent to your agency.

If you have any questions regarding this submittal, please feel free to contact me at (714) 904-3812.

Sincerely,

Leia Heritage

Leia Heritage
Senior Permitting Compliance Specialist
Kinder Morgan Liquids Terminals, LLC

Attachments

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard ● Baltimore MD 21230
(410) 537-3000 ● 1-800-633-6101 ● http://www.mde.state.md.us

PART 70 PERMIT APPLICATION FOR RENEWAL

AIR AND RADIATION ADMINISTRATION

Facilities required to obtain a Part 70 permit under COMAR 26.11.03.01 must complete and return this form. Applications are incomplete unless all applicable information required by COMAR 26.11.03.03 and 26.11.03.13 is supplied. Failure to supply additional information required by the Department to enable it to act on the application may result in loss of the application shield and denial of this application.

Owner and Operator:

Name of Owner or Operator: Kinder Morgan Liquids Terminals, LLC			
Street Address: 801 East Ordnance Road			
City: Baltimore	State: MD	Zip Code: 21226	
Telephone Number 410-636-0522		Fax Number	

Facility Information:

Name of Facility: Kinder Morgan Liquids Terminals, LLC		
Street Address: 801 East Ordnance Road		
City: Baltimore	State: MD	Zip Code: 21226
Plant Manager: Mr. Raymond Wagner	Telephone Number: 410-636-0522 ext 3	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters: 443-790-2199		

List, on a separate page, the names and telephone numbers of other facility owners and persons with titles.

SECTION 1. CERTIFICATION STATEMENTS

1. Compliance Status with Applicable Enhanced Monitoring and Compliance Certification Requirements

The emissions units identified in this application are in compliance with applicable enhanced monitoring and compliance certification requirements.

2. Certification of Current Compliance with All Applicable Federally Enforceable Requirements

Except for the requirements identified in Section 7 of this application, for which compliance is not achieved, I hereby certify, based on information and belief formed after reasonable inquiry, that the facility is currently in compliance with all applicable federally enforceable requirements and agree that the facility will continue to comply with those requirements during the permit term.

You must complete a Section 7 form for each non-complying emissions unit.

3. Statement of Compliance with Respect to All New Applicable Requirements Effective During the Permit Term

I hereby state, based on information and belief formed after reasonable inquiry, that the facility agrees to meet, in a timely manner, all applicable federally enforceable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement.

4. Risk Management Plan Compliance

I hereby certify that, based on information and belief formed after reasonable inquiry, that a Risk Management Plan as required under 112(r) of the Clean Air Act:

[X] has been submitted;

[ ] will be submitted at a future date; or

[ ] does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

RESPONSIBLE OFFICIAL:

X Raymond Wagner 12/18/2023

SIGNATURE DATE

Raymond Wagner

PRINTED NAME

Terminal Manager

TITLE

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

The major activities at the facility include warehousing and storage of bulk petroleum products. The primary sources of air emissions at the facility include eight (8) bulk petroleum storage tanks, seventeen (17) smaller storage tanks (additive, slop, butane, ruel oil storage, etc.), a five lane truck loading rack, one (1) carbon adsorption/ absorption vapor recovery unit (VRU), and one (1) vapor combustion unit (VCU). The primary standard industrial classification (SIC) code for this terminal is 4226.

2. Facility-Wide Emissions

A. This facility is required to obtain a Part 70 Operating Permit because it is: Check appropriate box:

X Actual Major

☐ Potential Major·
☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below: Tons during 2022

PM10__**N/A**_ NOx__**0.5**__ VOC__**32**___ SOx_**N/A**_ CO_**1.2**_ HAPs_**1.5**__

3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices;
Emissions Certification Report (copy of the most recent submitted to the Department.)

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-207L

2. MDE Registration No.:(if applicable)

1a. Date of installation (month/year):
Unknown/1969

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum product storage tank 207L. This tank has a storage capacity of 692,352 gallons. This tank is a cone roof tank. Liquids stored in this tank will be limited to those with a vapor pressure less than or equal to 5.1 kPa (0.74 psia). Potential to emit calculations for this emission unit were performed using available parameters for Ultra-Low Sulfur Diesel.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 0.20 PM10 --- HAPs 0.005

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-208M 1a. Date of installation (month/year): Unknown/1926 (modified 2018)	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum product storage tank 208M. This tank has a storage capacity of 2,989,014 gallons. This tank is equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 3.06 PM10 _____ HAPs 0.169

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-212Q 1a. Date of installation (month/year): Unknown/1961	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Refined petroleum product storage tank 212Q. This tank has a storage capacity of 3,267,905 gallons. The tank is equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). This tank is used as a swing tank and may contain regular or premium gasoline or ethanol. For potential to emit calculations, emissions were calculated for both gasoline and ethanol. The higher of the two (gasoline) was used. Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 1.35 PM10 _____ HAPs 0.058

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-213R 1a. Date of installation (month/year): Unknown/1995	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum storage tank 213R. This tank has a storage capacity of 3,335,066 gallons. This tank is equipped with a steel pan internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC___ PM10 --- HAPs 0.17

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-214S

2. MDE Registration No.:(if applicable)

1a. Date of installation (month/year):
Unknown/1929

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum storage tank 214S. This tank has a storage capacity of 3,248,243 gallons. This tank is equipped with an internal floating roof. The floating roof has a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 1.69 PM10 --- HAPS - 0.091

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-215T 1a. Date of installation (month/year): Unknown/1930	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum storage tank 215T. This tank has a storage capacity of 2,776,821 gallons. This tank is equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 4.01 PM10_____ HAPs 0.187

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-217V 1a. Date of installation (month/year): Unknown/1930 (modified 1998)	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Refined petroleum storage tank 217V. This tank has a storage capacity of 2,995,855 gallons. This tank is equipped with an internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Gasoline with an RVP of 9 to 15 psi was used in the potential to emit calculations for this tank. This represents the range of RVP (based on month) that can be found within the liquid stored in the tank throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 3.51 PM10 _____ HAPs 0.153

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-218W 1a. Date of installation (month/year): Unknown/1931 (modified 2006 and 2017)	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum product storage tank 218W. This tank has a storage capacity of 2,942,597 gallons. The tank is equipped with a internal floating roof with a mechanical shoe primary seal and a secondary wiper seal. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Ethanol is currently stored in this tank. Potential to emit calculations are based on ethanol storage throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 0.17 PM10 --- HAPs 0.0

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-LR 1a. Date of installation (month/year): Unknown/1989 (modified 2006 and 2011)	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Refined petroleum product loading rack with vapors controlled by either a John Zinc vapor recovery unit (VRU) (primary) or a vapor combustion unit (VCU) (secondary). The loading rack has five (5) bays with a total of 25 loading arms. Emissions from this emission unit include truck fugitives and emissions from both the VRU and VCU.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx--- SOx--- VOC_____ PM10_____ HAPs_____

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-10 1a. Date of installation (month/year): Unknown/1973	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is an 8,000-gallon horizontal storage tank. This tank stores fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank were performed using the currently-stored fuel additive.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 0.154 PM10 --- HAPs 0.003

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-11 1a. Date of installation (month/year): Unknown/1973	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is an 8,000-gallon horizontal storage tank. This tank stores fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank were performed using the currently-stored fuel additive.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx--- SOx--- VOC 0.004 PM10 HAPs 0

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-15 1a. Date of installation (month/year): Unknown/Unknown	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

This tank is a 10,000-gallon horizontal storage tank. This tank stores fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank performed using the currently-stored fuel additive.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx--- SOx--- VOC 0.146 PM10_____ HAPs 0.002

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-16 1a. Date of installation (month/year): Unknown/Unknown	2. MDE Registration No.:(if applicable)

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is a 10,000-gallon horizontal storage tank. This tank stores fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank were performed using the currently-stored fuel additive.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 0.0 PM10_____ HAPs 0.0

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-17

2. MDE Registration No.:(if applicable)

1a. Date of installation (month/year):
Unknown/1987

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is a 8,250-gallon horizontal storage tank. This tank stores fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank were performed using the currently-stored fuel additive.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC 0.151 PM10 _____ HAP 0.003

Source: 2022 Air Emission Inventory Report

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-23

2. MDE Registration No.:(if applicable)

1a. Date of installation (month/year):
Unknown/2006

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is a 4,500-gallon horizontal storage tank. This tank stores ethanol in the event that there is a spill. The tank is maintained empty until a spill event. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia). Potential to emit calculations are based on ethanol storage throughout the year.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC --- PM10 --- HAPs ---

This tank was not in use in 2022, therefore, there are no 2022 emissions.

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-26

2. MDE Registration No.:(if applicable)

1a. Date of installation (month/year):
April/2004

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
This tank is a 4,300-gallon horizontal storage tank. This tank is currently not in use but will store fuel additive. Products stored in this tank will be limited to liquids with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit calculations for this tank were performed using pure xylene for the tank contents. Xylene represents the most volatile hazardous air pollutant found within the fuel additives currently in use at the facility.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Not Applicable		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major:_____ (note: before control device)

B. Actual Emissions: NOx --- SOx --- VOC --- PM10 --- HAPs ---

This tank was not in use in 2022, therefore, there are no 2022 emissions.

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: _Entire Site_____General Reference: _____

Briefly describe the Emission Standard/Limit or Operational Limitation:

_____

_Subpart Kb - Storage Tank REquirements_____

__Subpart BBBBBB - Monitoring requirements for control equipment_____

_____

Permit Shield Request: _____

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- **X Annual Compliance Certification:**_____
- **X Semi-Annual Monitoring Report:**_____

Methods used to demonstrate compliance: **See most recent Semi-Annual Monitoring Report - attached**

Monitoring: Reference _____ Describe: _____
_____
_____
_____

Testing: Reference _____ Describe: _____
_____
_____
_____

Record Keeping: Reference _____ Describe: _____
_____
_____
_____

Reporting: Reference _____ Describe: _____
_____
_____
_____

Frequency of submittal of the compliance demonstration: _____

SECTION 3C. OBSOLETE, EXTRANEOUS, OR INSIGNIFICANT PERMIT CONDITIONS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: _____Permit to Construct No. _____

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: Not Applicable

Briefly describe any alternate operating scenarios. Assign a number to each scenario for identification purposes.

SECTION 3E. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO

Scenario No.: Not Applicable

Emissions Unit No.: _____ **General Reference:** _____

Briefly describe any applicable Emissions Standard/Limits/Operational Limitations:

_____

_____

_____

_____

_____

_____

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

_____

_____

_____

Testing: Reference _____ Describe: _____

_____

_____

_____

Record Keeping: Reference _____ Describe: _____

_____

_____

_____

Reporting: Reference _____ Describe: _____

_____

_____

_____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. :	2. Emissions Point No.:
EU-LR	

3. Type and Description of Control Equipment:

John Zink Vapor Recovery Unit (VRU) - Unit that is main emission control for a five lane loading rack.

The unit is equipped with two, identical adsorbers, each filled with activated carbon. One adsorber vessel is On-stream in the regeneration mode. Switching valves automatically alternate the adsorbers between adsorption and regeneration. To process the vapors, the mixture first flows up through the on-stream adsorber vessel. There, the activated carbon adsorbs, the hydrocarbon vapor, so clean air vents from the bed with minimal hydrocarbon content. The emissions are vented to the atmosphere from an exhaust stack approximately 25 feed above ground level. The second adsorber is being regenerated off-line at the same time. The carbon bed regeneration uses a combination of high vacuum and purge air stripping to removed previously adsorbed hydrocarbon vapor from the carbon and restore the carbon's ability to adsorb vapor during the next cycle.

4. Pollutants Controlled:	Control Efficiency:
VOC (VRU)	99%

5. Capture Efficiency: 99.2% - VRU

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. :	2. Emissions Point No.:
EU-LR	

3. Type and Description of Control Equipment:
John Zink Vapor Combustor Unit (VCU)
The emissions are vented to the atmosphere from an exhaust stack approximately 35 feed above ground level.
The unit is in operation only while trucks are being loaded and vapors are entering the combustion zone. When this occurs, the combustion products will include hydrocarbons, carbon monoxide, oxides of nitrogen, and carbon dioxide.

4. Pollutants Controlled:	Control Efficiency:
VOC, CO, CO2	98.7%

5. Capture Efficiency:

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	VOC	NOx	CO	SOx	PM/PM10/PM2.5
CAS Number	8006-61-9	11104-93-1	630-08-0	7446-09-5	N/A
Emissions Unit #207L	0.25	----	----	----	----
Emissions Unit #208M	11.86	----	----	----	----
Emissions Unit #212Q	8.75	----	----	----	----
Emissions Unit #213R	13.00	----	----	----	----
Emissions Unit # 214S	13.95	----	----		----
Emissions Unit # 215T	10.84	----	----	----	----
Emissions Unit #217V	11.03	----	----	----	----
Emissions Unit #218W	0.97	----	----	----	----
Emissions Unit #LR	26.01	----	----	----	----
Emissions Unit # 7	3.24E-03	----	----	----	----
Emissions Unit # 8	5.47E-05	----	----	----	----
Emissions Unit # 9	8.42E-04	----	----	----	----
Emissions Unit # 10	2.23E-02	----	----	----	----
Emissions Unit # 11	3.29E-03	----	----	----	----
Emissions Unit # 12	---	---	---	---	---
Emissions Unit # 13	4.20E-04	----	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	VOC	NOx	CO	SOx	PM/PM10/PM2.5
CAS Number	8006-61-9	11104-93-1	630-08-0	7446-09-5	N/A
Emissions Unit #14	1.10E-04	----	----	----	----
Emissions Unit #15	5.21E-03	----	----	----	----
Emissions Unit #16	4.78E-03	----	----	----	----
Emissions Unit #17	6.09E-02	----	----	----	----
Emissions Unit # 18	1.10E-04	----	----	----	----
Emissions Unit # 19	2.75E-04	----	----	----	----
Emissions Unit #20	2.75E-04	----	----	----	----
Emissions Unit #23	4.92E-02	----	----	----	----
Emissions Unit #25	8.34E-05	----	----	----	----
Emissions Unit # 26	2.00E-03	----	----	----	----
Emissions Unit # BLR-1	2.08E-03	0.12	3.07E-02	4.35E-02	1.23E-02
Emissions Unit # Fume-1	2.32E-02	----	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	0.54	----	----	----	----
Total	97.37	0.12	3.07E-02	4.35E-02	1.23E-02

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Xylenes	Ethylbenzene	Cumene	Naphthalene	Hexane
CAS Number	1330-20-7	100-41-4	98-82-8	91-20-3	110-54-3
Emissions Unit # 207L	----	----			
Emissions Unit # 208M	1.29	0.20			
Emissions Unit # 212Q	1.44	0.16			
Emissions Unit # 213R	1.04	0.23			
Emissions Unit # 214S	1.10	0.25			
Emissions Unit # 215T	0.78	0.19			
Emissions Unit # 217V	0.96	0.22			
Emissions Unit # 218W	0.06	1.14E-02			
Emissions Unit # LR	2.34	0.47			
Emissions Unit # 7	----	----			
Emissions Unit # 8	2.74E-06	8.21E-07			
Emissions Unit # 9	----	----			
Emissions Unit # 10	3.35E-03	1.12E-03			
Emissions Unit # 11	8.05E-05	----			
Emissions Unit # 12	----	----			
Emissions Unit # 13	2.10E-05	6.30E-06			
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Xylenes	Ethylbenzene	Cumene	Naphthalene	Hexane
CAS Number	1330-20-7	100-41-4	98-82-8	91-20-3	110-54-3
Emissions Unit # 14	5.49E-06	1.65E-06			
Emissions Unit # 15	1.28E-04	----			
Emissions Unit # 16	----	----			
Emissions Unit # 17	1.22E-02	3.05E-03			
Emissions Unit # 18	5.49E-06	1.65E-06			
Emissions Unit # 19	----	----			
Emissions Unit # 20	----	----			
Emissions Unit # 23	----	----			
Emissions Unit # 25	4.17E-06	1.25E-06			
Emissions Unit # 26	2.00E-03	----			
Emissions Unit # BLR-1	----	----			
Emissions Unit # Fume-1	8.68E-05	2.60E-05			
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	0.05	1.09E-02			
Total	9.06	1.75			

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Benzene	Toluene	Acenaphthene	Acenaphthylene	Anthracene
CAS Number	71-43-2	108-88-3	83-32-9	208-96-8	120-12-7
Emissions Unit #207L	----	----	----	----	----
Emissions Unit #208M	0.33	1.81	----	----	----
Emissions Unit #212Q	0.31	1.70	----	----	----
Emissions Unit #213R	0.42	2.29	----	----	----
Emissions Unit # 214S	0.44	2.41	----	----	----
Emissions Unit # 215T	0.31	1.71	----	----	----
Emissions Unit #217V	0.38	2.10	----	----	----
Emissions Unit #218W	2.33E-02	0.13	----	----	----
Emissions Unit #LR	0.93	5.14	----	----	----
Emissions Unit # 7	3.24E-06	4.87E-05	----	----	----
Emissions Unit # 8	1.09E-06	6.02E-06	----	----	----
Emissions Unit # 9	----	----	----	----	----
Emissions Unit # 10	----	----	----	----	----
Emissions Unit # 11	----	----	----	----	----
Emissions Unit # 12	----	----	----	----	----
Emissions Unit # 13	8.40E-06	4.62E-05	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Benzene	Toluene	Acenaphthene	Acenaphthylene	Anthracene
CAS Number	71-43-2	108-88-3	83-32-9	208-96-8	120-12-7
Emissions Unit #14	2.20E-06	1.21E-05	----	----	----
Emissions Unit #15	----	----	----	----	----
Emissions Unit #16	----	----	----	----	----
Emissions Unit #17	----	----	----	----	----
Emissions Unit # 18	2.20E-06	1.21E-05	----	----	----
Emissions Unit # 19	----	----	----	----	----
Emissions Unit #20	----	----	----	----	----
Emissions Unit #23	4.92E-05	7.39E-04	----	----	----
Emissions Unit # 25	1.67E-06	9.17E-06	----	----	----
Emissions Unit # 26	----	----	----	----	----
Emissions Unit # BLR-1	1.31E-06	3.80E-05	1.29E-07	1.55E-09	7.48E-09
Emissions Unit # Fume-1	3.47E-05	1.91E-04	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	2.18E-02	0.05	----	----	----
Total	3.17	9.06	1.29E-07	1.55E-09	7.48E-09

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Arsenic	Benz(a)anthracene	Benzo(g,h,i)perylene	Beryllium	Cadmium
CAS Number	7440-38-2	56-55-3	191-24-2	7440-41-7	7440-43-9
Emissions Unit # 207L	----	----	----	----	----
Emissions Unit # 208M	----	----	----	----	----
Emissions Unit # 212Q	----	----	----	----	----
Emissions Unit # 213R	----	----	----	----	----
Emissions Unit # 214S	----	----	----	----	----
Emissions Unit # 215T	----	----	----	----	----
Emissions Unit # 217V	----	----	----	----	----
Emissions Unit # 218W	----	----	----	----	----
Emissions Unit # LR	----	----	----	----	----
Emissions Unit # 7	----	----	----	----	----
Emissions Unit # 8	----	----	----	----	----
Emissions Unit # 9	----	----	----	----	----
Emissions Unit # 10	----	----	----	----	----
Emissions Unit # 11	----	----	----	----	----
Emissions Unit # 12	----	----	----	----	----
Emissions Unit # 13	----	----	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Arsenic	Benz(a)anthracene	Benzo(g,h,i)perylene	Beryllium	Cadmium
CAS Number	7440-38-2	56-55-3	191-24-2	7440-41-7	7440-43-9
Emissions Unit #14	----	----	----	----	----
Emissions Unit #15	----	----	----	----	----
Emissions Unit #16	----	----	----	----	----
Emissions Unit #17	----	----	----	----	----
Emissions Unit # 18	----	----	----	----	----
Emissions Unit # 19	----	----	----	----	----
Emissions Unit #20	----	----	----	----	----
Emissions Unit #23	----	----	----	----	----
Emissions Unit # 25	----	----	----	----	----
Emissions Unit # 26	----	----	----	----	----
Emissions Unit # BLR-1	8.09E-06	2.46E-08	1.39E-08	1.70E-07	2.44E-06
Emissions Unit # Fume-1	----	----	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	----	----	----	----	----
Total	8.09E-06	2.46E-08	1.39E-08	1.70E-07	2.44E-06

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Chromium	Chrysene	Cobalt	Dibenzo(a,h)anthracene	Fluoranthene
CAS Number	7440-47-3	218-01-9	N/A	53-70-3	206-44-0
Emissions Unit #207L	----	----	----	----	----
Emissions Unit #208M	----	----	----	----	----
Emissions Unit #212Q	----	----	----	----	----
Emissions Unit #213R	----	----	----	----	----
Emissions Unit # 214S	----	----	----	----	----
Emissions Unit # 215T	----	----	----	----	----
Emissions Unit #217V	----	----	----	----	----
Emissions Unit #218W	----	----	----	----	----
Emissions Unit #LR	----	----	----	----	----
Emissions Unit # 7	----	----	----	----	----
Emissions Unit # 8	----	----	----	----	----
Emissions Unit # 9	----	----	----	----	----
Emissions Unit # 10	----	----	----	----	----
Emissions Unit # 11	----	----	----	----	----
Emissions Unit # 12	----	----	----	----	----
Emissions Unit # 13	----	----	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Chromium	Chrysene	Cobalt	Dibenzo(a,h)anthracene	Fluoranthene
CAS Number	7440-47-3	218-01-9	N/A	53-70-3	206-44-0
Emissions Unit #14	----	----	----	----	----
Emissions Unit #15	----	----	----	----	----
Emissions Unit #16	----	----	----	----	----
Emissions Unit #17	----	----	----	----	----
Emissions Unit # 18	----	----	----	----	----
Emissions Unit # 19	----	----	----	----	----
Emissions Unit #20	----	----	----	----	----
Emissions Unit #23	----	----	----	----	----
Emissions Unit # 25	----	----	----	----	----
Emissions Unit # 26	----	----	----	----	----
Emissions Unit # BLR-1	5.18E-06	1.46E-08	3.96E-05	1.02E-08	2.97E-08
Emissions Unit # Fume-1	----	----	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	----	----	----	----	----
Total	5.18E-06	1.46E-08	3.96E-05	1.02E-08	2.97E-08

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Fluorene	Formaldehyde	Indeno(1,2,3-cd)pyrene	Lead	Manganese
CAS Number	86-73-7	50-00-0	193-39-5	7439-92-1	7439-96-5
Emissions Unit #207L	----	----	----	----	----
Emissions Unit #208M	----	----	----	----	----
Emissions Unit #212Q	----	----	----	----	----
Emissions Unit #213R	----	----	----	----	----
Emissions Unit # 214S	----	----	----	----	----
Emissions Unit # 215T	----	----	----	----	----
Emissions Unit #217V	----	----	----	----	----
Emissions Unit #218W	----	----	----	----	----
Emissions Unit #LR	----	----	----	----	----
Emissions Unit # 7	----	----	----	----	----
Emissions Unit # 8	----	----	----	----	----
Emissions Unit # 9	----	----	----	----	----
Emissions Unit # 10	----	----	----	----	----
Emissions Unit # 11	----	----	----	----	----
Emissions Unit # 12	----	----	----	----	----
Emissions Unit # 13	----	----	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Fluorene	Formaldehyde	Indeno(1,2,3-cd)pyrene	Lead	Manganese
CAS Number	86-73-7	50-00-0	193-39-5	7439-92-1	7439-96-5
Emissions Unit #14	----	----	----	----	----
Emissions Unit #15	----	----	----	----	----
Emissions Unit #16	----	----	----	----	----
Emissions Unit #17	----	----	----	----	----
Emissions Unit # 18	----	----	----	----	----
Emissions Unit # 19	----	----	----	----	----
Emissions Unit #20	----	----	----	----	----
Emissions Unit #23	----	----	----	----	----
Emissions Unit # 25	----	----	----	----	----
Emissions Unit # 26	----	----	----	----	----
Emissions Unit # BLR-1	2.74E-08	2.02E-04	1.31E-08	9.26E-06	1.84E-05
Emissions Unit # Fume-1	----	----	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	----	----	----	----	----
Total	2.74E-08	2.02E-04	1.31E-08	9.26E-06	1.84E-05

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Mercury	MTBE	Nickel	Selenium	POM
CAS Number	7439-97-6	1634-04-4	7440-02-0	7782-49-2	N/A
Emissions Unit # 207L	----	----	----	----	----
Emissions Unit # 208M	----	1.48	----	----	----
Emissions Unit # 212Q	----	1.39	----	----	----
Emissions Unit # 213R	----	1.88	----	----	----
Emissions Unit # 214S	----	1.97	----	----	----
Emissions Unit # 215T	----	1.40	----	----	----
Emissions Unit # 217V	----	1.72	----	----	----
Emissions Unit # 218W	----	0.10	----	----	----
Emissions Unit # LR	----	4.20	----	----	----
Emissions Unit # 7	----	----	----	----	----
Emissions Unit # 8	----	4.93E-06	----	----	----
Emissions Unit # 9	----	----	----	----	----
Emissions Unit # 10	----	----	----	----	----
Emissions Unit # 11	----	----	----	----	----
Emissions Unit # 12	----	----	----	----	----
Emissions Unit # 13	----	3.78E-05	----	----	----
Fugitive Emissions	----	----	----	----	----
Total	----	----	----	----	----

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Mercury	MTBE	Nickel	Selenium	POM
CAS Number	7439-97-6	1634-04-4	7440-02-0	7782-49-2	N/A
Emissions Unit #14	----	9.88E-06	----	----	----
Emissions Unit #15	----	----	----	----	----
Emissions Unit #16	----	----	----	----	----
Emissions Unit #17	----	----	----	----	----
Emissions Unit # 18	----	9.88E-06	----	----	----
Emissions Unit # 19	----	----	----	----	----
Emissions Unit #20	----	----	----	----	----
Emissions Unit #23	----	----	----	----	----
Emissions Unit # 25	----	7.51E-06	----	----	----
Emissions Unit # 26	----	----	----	----	----
Emissions Unit # BLR-1	6.93E-07	----	5.18E-04	4.19E-06	2.02E-05
Emissions Unit # Fume-1	----	1.56E-04	----	----	----
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions	----	----	----	----	----
Total	6.93E-07	14.24	5.18E-04	4.19E-06	2.02E-05

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Total HAPs				
CAS Number	N/A				
Emissions Unit # 207L	----				
Emissions Unit # 208M	5.15				
Emissions Unit # 212Q	4.80				
Emissions Unit # 213R	5.52				
Emissions Unit # 214S	6.83				
Emissions Unit # 215T	4.86				
Emissions Unit # 217V	5.96				
Emissions Unit # 218W	0.36				
Emissions Unit # LR	14.50				
Emissions Unit # 7	5.19E-05				
Emissions Unit # 8	1.73E-05				
Emissions Unit # 9	7.57E-06				
Emissions Unit # 10	5.13E-03				
Emissions Unit # 11	2.42E-04				
Emissions Unit # 12	----				
Emissions Unit # 13	1.33E-04				
Fugitive Emissions	----				
Total	----				

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	Total HAPs				
CAS Number	N/A				
Emissions Unit #14	1.33E-04				
Emissions Unit #15	3.46E-05				
Emissions Unit #16	----				
Emissions Unit #17	1.52E-02				
Emissions Unit # 18	3.46E-05				
Emissions Unit # 19	----				
Emissions Unit #20	4.13E-06				
Emissions Unit #23	7.88E-04				
Emissions Unit # 25	2.63E-05				
Emissions Unit # 26	2.00E-03				
Emissions Unit # BLR-1	8.63E-04				
Emissions Unit # Fume-1	5.48E-04				
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total	48.36				

SECTION 6. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

Not Applicable

2. Brief Description:

_____

_____

_____

3. Reasons for Proposed Exemption or Justification of Non-applicability:

_____

_____

_____

_____

_____

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit #	Anticipated Compliance Date
Not Applicable	
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:

_____

_____

_____

_____

_____

_____

Certified Progress Reports for sources in noncompliance shall be submitted at least quarterly to the Department.

STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: Kinder Morgan Liquids Terminals LLC	County Anne Arundel
Premises Number: 24-003-00309	
Street Address: 801 East Ordnance Road, Baltimore, Maryland 21226	
24-hour Emergency Telephone Number for Air Pollution Matters: 410-636-0522 (Curtis Bay Terminal), 800-510-5678 (Kinder Morgan Control Center)	
Type of Equipment (List Significant Units):	
The facility is a bulk petroleum storage and distribution center (SIC Code 5171). The facility has eight (8) bulk	
petroleum storage tanks and seven (7) smaller petroleum and fuel additive storage tanks The facility has a five (5)	
bay loading rack fitted with a vapor recovery unit and has a backup vapor combustion unit.	

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: 24-003-00309

Emissions Unit No.: Facility-Wide

General Reference: COMAR 26.11.06.08, 26.11.06.09, 26.11.15.05, 26.11.15.06

Briefly describe the requirement and the emissions limit (if applicable):

The facility must be operated or maintained such that it does not discharge emissions that create a nuisance or air pollution beyond the property line.

The Permittee must implement "Best Available Control Technologyfor Toxics" (T-BACT) to control emissions of toxic air pollutants.

The discharge of toxic air pollutants that will unreasonably endanger human health is prohibited.

Methods used to demonstrate compliance:

The permittee shall submit a written certification of the facility's emissions during the previous calendar year by April 1st. The certification shall include either: (a) a statement that the previously submitted compliance demonstrations from emissions of toxic air pollutants remain valid; or (b) a revised compliance demonstration, developed in accordance with COMAR 26.11.15 and 16 requirements,that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

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RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

III. Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility. Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

(1) No. 1 ___ Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour; Office Building Heat

(2) No. 0 ___ Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;

(3) No. 0 ___ Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts)of power output

(4) 0 ___ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) 0 ___ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(6) No. 0 ___ Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

(7) 0 ___ Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;

(8) 0 ___ Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

(9) 0 ___ Confection cookers where the products are edible and intended for human consumption;

(10) 0 ___ Die casting machines;

(11) 0 ___ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;

(12) 0 ___ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

(13) 0 ___ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

(14) 0 ___ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;

(15) 0 ___ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;

(16) Containers, reservoirs, or tanks used exclusively for:

(a) 0 ___ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;

(b) 0 ___ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;

(c) 1 ___ Storage of butane, propane, or liquefied petroleum, or natural gas; EU-12 (60,000-gallon butane bullet)

(d) No. 0 ___ Storage of lubricating oils:

(e) No. 0 ___ Unheated storage of VOC with an initial boiling point of 300 °F (

(f) No. 1 ___ Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel, EU-20

(g) No. 2 ___ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less; EU-8, EU-25

(h) No. 6 ___ The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less; EU-7, EU-9, EU-13, EU-14, EU-18, and EU-19

(17) 0 ___ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;

(18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,

or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

(a) 0 ___ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

(b) 0 ___ Magnesium or any alloy containing over 50 percent magnesium;

(c) 0 ___ Lead or any alloy containing over 50 percent lead;

(d) 0 ___ Tin or any alloy containing over 50 percent tin;

(e) 0 ___ Zinc or any alloy containing over 50 percent zinc;

(f) 0 ___ Copper;

(g) 0 ___ Precious metals;

(19) 0 ___ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(20) 0 ___ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(21) 0 ___ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;

(22) 0 ___ Potable water treatment equipment, not including air stripping equipment;

(23) 0 ___ Firing and testing of military weapons and explosives;

(24) 0 ___ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

(25) 0 ___ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(26) 0 ___ Grain, metal, or mineral extrusion presses;

(27) 0 ___ Breweries with an annual beer production less than 60,000 barrels;

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(28) 0 Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29) 1 Laboratory fume hoods and vents; Hood vents sample fumes

(30) No. 0 Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

(31) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 0 _____

No. ___ _____

No. ___ _____

No. ___ _____

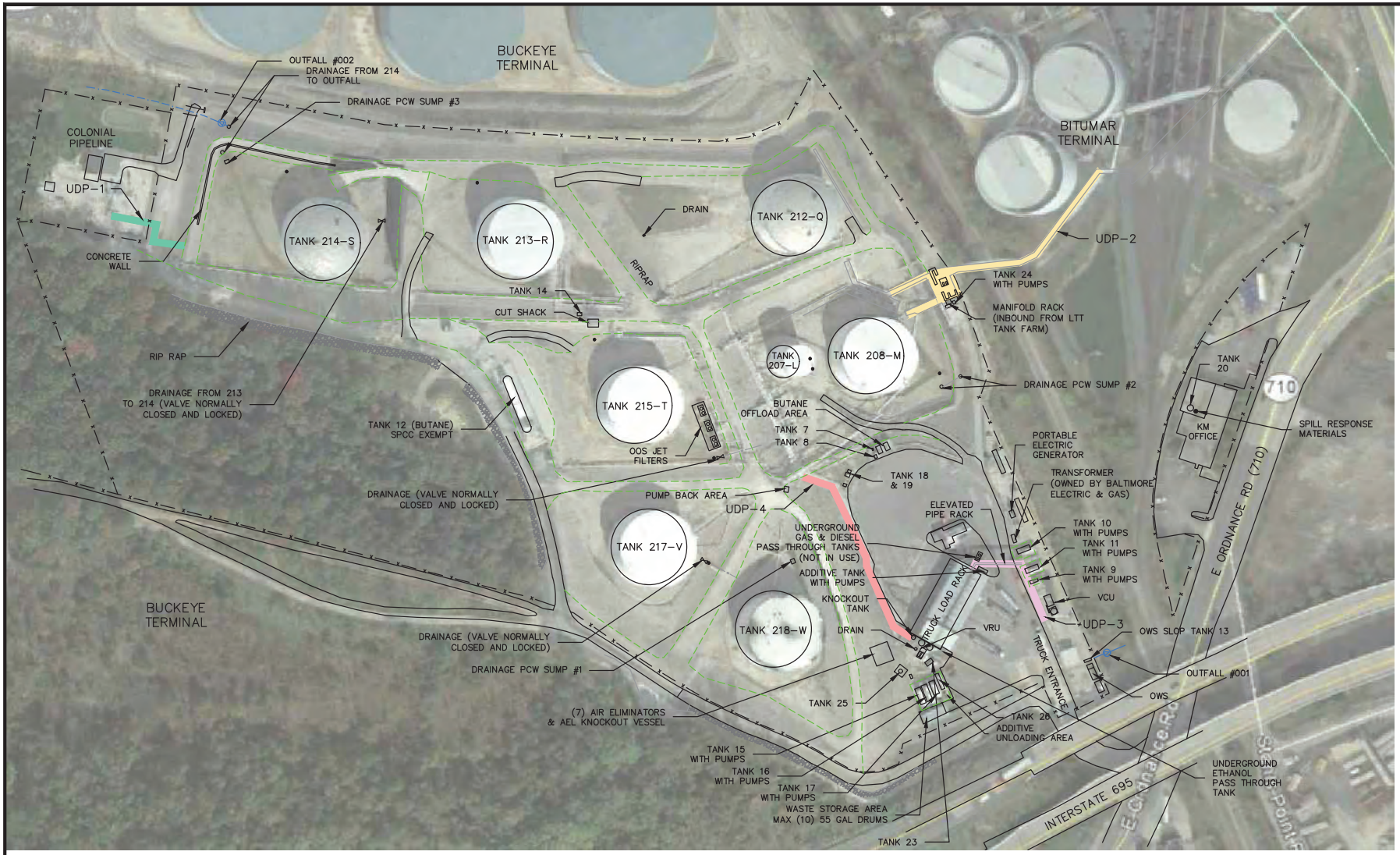
No. ___ _____

(32) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. 0 _____

No. ___ _____

No. ___ _____



EXPLANATION

- FENCE
- CONTAINMENT BERM
- FACILITY PIPING
- UNDIKED PIPING (UDP)

N

0 150 300

APPROXIMATE SCALE IN FEET

REV	DATE	BY	DESCRIPTION
1	AUGUST 2016	SG/VN	CREATED BASEMAP

DESIGNED SG
DRAWN VEN
CHECKED BDG

SUBMITTED BY
SHANNON GROSS (PROJECT ENGINEER/GEOLOGIST) N/A LICENSE NO.
JENNIFER KOLBE (PROJECT MANAGER) PE 034643 LICENSE NO.

Stantec

KINDER MORGAN
CURTIS BAY TERMINAL
BALTIMORE, MD

FACILITY AERIAL PIPING DIAGRAM

FIGURE 3

Y:\I O\Projects\Plantation Pipe Line\Curtis Bay\7.0 Designs\7.7 Design Drawings\Curtis Bay SPCC Figures.dwg

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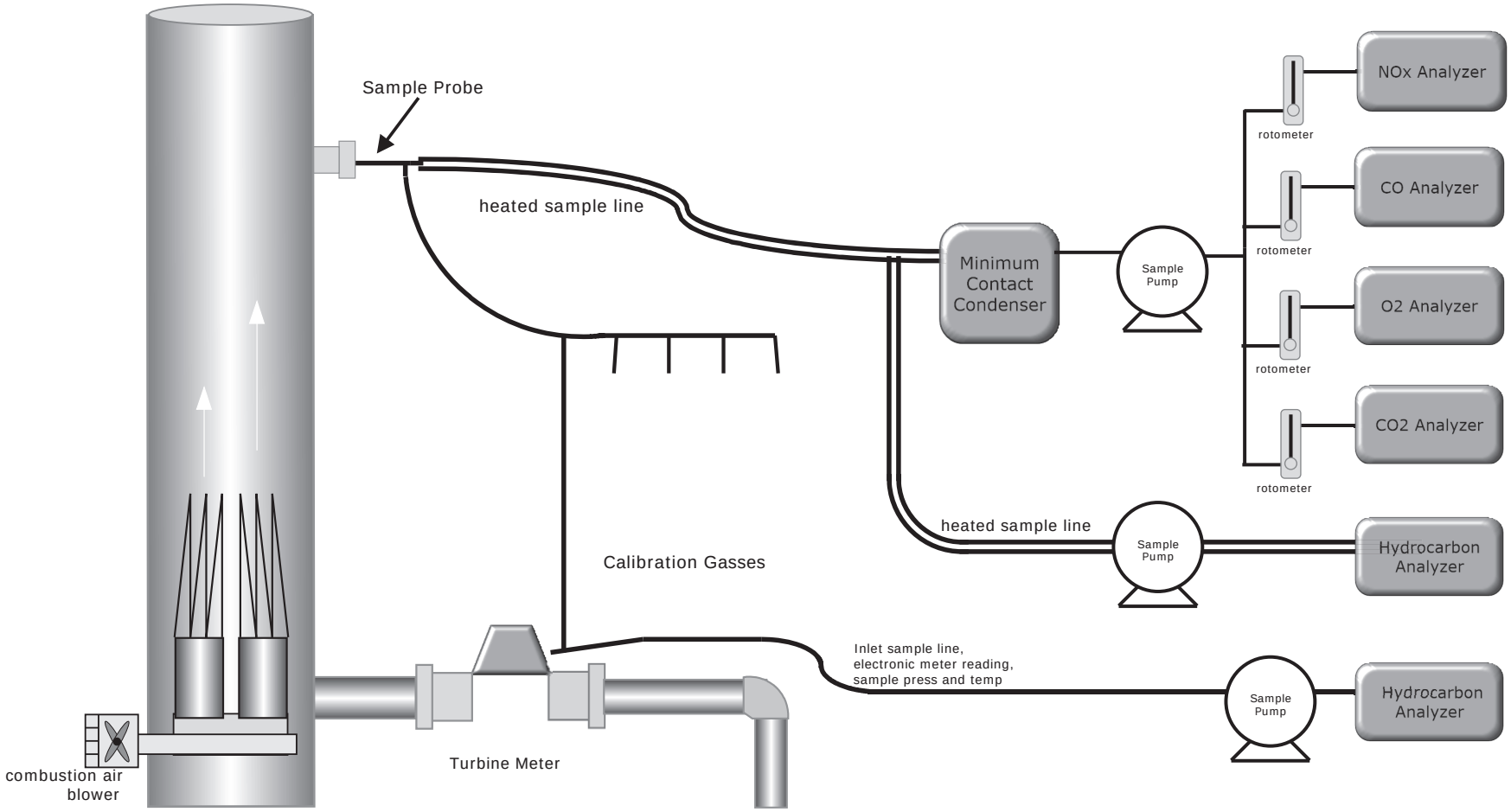

Figure 1: Sample System Diagram

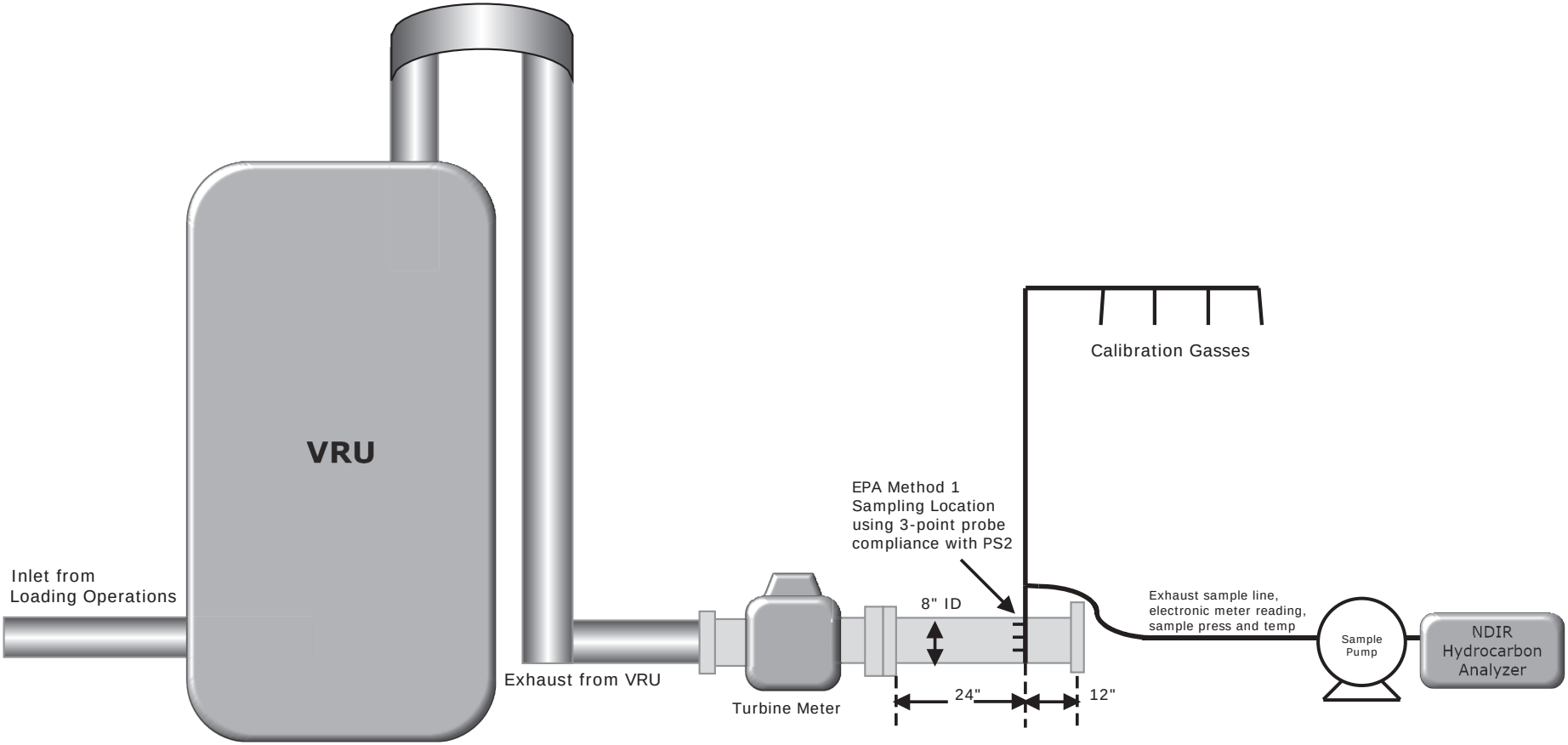

Figure 1: Sample System Diagram

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	CAM Plan
	Indicator No. 1
I. Indicator 64.4(a)(1)	Vapor line back pressure
Monitoring Approach	Pressure gauge
II. Indicator Range 64.4(a)(2)	An excursion is defined as any time that the pressure gauge indicates greater than 18" of water and truck loading is still occurring.
Reporting Threshold	All pressure gauge readings greater than 18" water column shall be reported to MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The back pressure is monitored using a portable pressure gauge, which is placed on the vapor hose connection to the tanker truck.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. AQ/QC Practices and Criteria	Preventive maintenance is performed on the back pressure gauge three times (3) per year. The back pressure gauge is calibrated or replaced at least once every five (5) years during the VRU performance test.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly visual reading with manual log entry.
F. Averaging Period	N/A

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	CAM Plan
	Indicator No. 2
I. Indicator 64.4(a)(1)	VRU Operation
Monitoring Approach	Continuous Emissions Monitoring System (CEMS)
II. Indicator Range 64.4(a)(2)	7 mg/L
Reporting Threshold	All excursions will be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The minimum accuracy of the CEMS is +/- 1.0 percent.
B. Verification of Operational Status	CEMS
C. AQ/QC Practices and Criteria	CEMS is calibrated daily.
D. Monitoring Frequency	Continuous
E. Data Collection	Continuous
F. Averaging Period	Hourly

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	CAM Plan
	Indicator No. 3
I. Indicator 64.4(a)(1)	Equipment leaks
Monitoring Approach	Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline will be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. The detection method will be sight, sound, or smell.
II. Indicator Range 64.4(a)(2)	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days.
Reporting Threshold	All excursions and corrective actions taken will be reported to MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The terminal operations personnel will be trained on the procedures to detect and record excursions, and initiate and record corrective actions.
B. Verification of Operational Status	N/A
C. AQ/QC Practices and Criteria	The operations personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	N/A

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	**CAM Plan**
VRU and VCU	**Indicator No. 4**
I. Indicator 64.4(a)(1)	Documentation of preventive maintenance
Monitoring Approach	Proper VRU operation is verified by performing preventive maintenance three times per year, according to the manufacturer's recommendations.
II. Indicator Range 64.4(a)(2)	An excursion occurs if the preventive maintenance is not performed or documented.
Reporting Threshold	All excursions will be reported to MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The VRU operation will be verified by a trained personnel or service person using a preventive maintenance checklist that is based on recommendations provided by the VRU manufacturer.
B. Verification of Operational Status	N/A
C. AQ/QC Practices and Criteria	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	Preventive maintenance shall be performed three times during a calendar year.
E. Data Collection	Results of inspections and maintenance performed during preventive maintenance are manually recorded and maintained on site.
F. Averaging Period	N/A

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	CAM Plan
VCU	**Indicator No. 5**
I. Indicator 64.4(a)(1)	Presence of a flame within the VCU stack
Monitoring Approach	Pilot (flame) detector
II. Indicator Range 64.4(a)(2)	An excursion is defined as a failure for the pilot detector to shut down the VCU when there is no flame.
Reporting Threshold	All excursions will be reported to MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start up, and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures that, if no flame is detected, the VCU and loading rack cannot operate.
C. AQ/QC Practices and Criteria	Preventive maintenance is performed on the VCU three times per year. During each visit, the following items are checked to ensure proper pilot operation: • pull and clean pilot strainer; • pull and clean assist gas strainer; • check all indicator lights and sensors, replace if faulty; • inspect spark ignition systems; • ensure burner scanner is operating properly by blocking scanner and starting unit (unit should shut down upon pilot flame failure); • and complete start-up procedure is checked.
D. Monitoring Frequency	Pilot detector operates continuously

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

E. Data Collection	Results of inspections and maintenance performed of the pilot operation are manually recorded and maintained on site.
F. Averaging Period	N/A

Table IV-5 CAM Plan
For the Vapor Recovery Unit (VRU) and Vapor Combustion Unit (VCU)

Part 64 Requirement	CAM Plan
VCU	**Indicator No. 6**
I. Indicator 64.4(a)(1)	Visible emissions observations during loading operations
Monitoring Approach	Conduct visible emissions operations.
II. Indicator Range 64.4(a)(2)	An excursion occurs if visible emissions are observed. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Reporting Threshold	All excursions will be reported to MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	See A – F below
A. Data Representativeness	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	N/A
C. AQ/QC Practices and Criteria	The observers are trained on procedures in making an observation and record keeping requirements.
D. Monitoring Frequency	At least once per month, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 6-minute period.
E. Data Collection	Results of observations are manually recorded and maintained on site. Records include date, time, and results of the observation.
F. Averaging Period	N/A