

SIP CONSTRUCTION & OPERATING PERMIT AND TITLE V 502(b)10 CHANGE APPLICATION REVIEW

Facility Name: **Vopak Terminal Savannah, Inc.**

City: Savannah

County: Chatham

AIRS #: 04-13-051-00058

Application #: 16131

Date SIP Application Received: March 28, 2005

Date Title V Application Received: March 28, 2005

Permit No: 4226-051-0058-V-01-2

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1), 391-3-1-.03(2), and 391-3-1-.03(10). of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, all administrative amendments and minor and significant modifications to that permit, and any 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
4226-051-0058-V-01-0	June 19, 2002	X	
4226-051-0058-V-01-1	December 30, 2003	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
4226-051-0058-V-01-0	Appealed July 19, 2002
4226-051-0058-V-01-1	Significant modification without construction to accurately reflect the requirements of 40 CFR 60 Subparts K, Ka, Kb, and XX; 40 CFR 63 Subparts R and Y; and Georgia Rules 391-3-1-.02(2)(bb), 391-3-1-.02(2)(cc), and 391-3-1-.02(2)(nn), and to remove all 40 CFR 61 Subparts Y and BB and Georgia Rule 391-3-1-.02(2)(pp), 391-3-1-.02(2)(ss), and 391-3-1-.02(2)(vv) requirements. All existing permit conditions are deleted and replaced with the attached conditions.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is a major source under PSD regulations. The facility has not undergone a PSD review, nor has it taken any PSD Avoidance limits.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM ₁₀	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
CO	Yes			✓
TRS	No			
H ₂ S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

Application No. 16131 was submitted by Vopak Terminal Savannah on March 21, 2005 for the replacement of Process Steam Boiler #2 (Source Code: BL02). This application is being processed as a section 502(b)(10) change to Title V Permit No. 4226-051-0058-V-01-0 since this modification does not contravene any existing federally enforceable permit conditions, does not allow exceedance of an allowable emission limit, and is not a Title I modification. Emissions are expected to be less than the original boiler due to better efficiency.

B. Emissions Change

The facility did not provide estimated emission changes due to the replacement of the BL02 boiler. However, emissions from the new boiler are expected to be less than the original boiler due to better efficiency of a new unit.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	
PM ₁₀	Yes	0	
SO ₂	Yes	0	
VOC	Yes	0	
NO _x	Yes	0	
CO	Yes	0	
TRS	No		
H ₂ S	No		
Individual HAP	No		

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
Total HAPs	No		

C. Title I Modification

- PSD/NSR Applicability – Not Applicable
- NSPS Modification – Since the new boiler has a rated heat input of less than 10 MMBTU/hour, 40 CFR 60 Subpart Dc is not triggered by this modification.
- NESHAP Modification – Not Applicable

III. Facility Wide Requirements

- A. Emission and Operating Caps – Not Applicable
- B. Applicable Rules and Regulations – Not Applicable
- C. Compliance Status – Not Applicable
- D. Operational Flexibility – Not Applicable
- E. Permit Conditions - There are no new or modified permit conditions in Section 2.0 of the Permit due to this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

Vopak replaced existing boiler BL02 in December 2004. Old BL02 had 7.32 MMBTU/hour heat input and was over 30 years old. New BL02 has a 8.37 MMBTU/hour heat input. The boiler will fire natural gas or No. 2 fuel oil. Since the boiler has less than 10 MMBTU/hour heat input, and has the same source code as the old boiler, existing permit conditions 3.4.4, 3.4.5, 3.4.6, 6.1.7.b.ii, and 6.2.7 are not affected.

- B. Equipment List for the New or Modified Process(es) – Since the new boiler will have the same source code as the old boiler, and there are no changes to rule applicability, there are no changes to Equipment Table 3.1.A.
- C. Equipment & Rule Applicability – The new BL02 boiler is subject to Georgia Rules 391-3-1-.02(2)(d) – “Fuel-burning Equipment” and 391-3-1-.02(2)(g) – “Sulfur Dioxide.” These rules limit the fly ash-particulate matter and opacity emissions and sulfur content of the fuel oil fired in the new boiler. No other rules apply to the new BL02.

D. Compliance Status - The facility currently has a Notice of Violation (NOV) issued to them for constructing this boiler without a permit. This NOV was issued by the Coastal District – Savannah Office. According to the March 9, 2005 NOV, the submittal of this application and revision of the Annual Compliance Certification would rectify the issue. Therefore, no compliance schedule is needed in Section 7.7 of the Permit.

E. Operational Flexibility - Not Applicable

F. Permit Conditions - There are no new or modified permit conditions in Section 2.0 due to this modification.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Not Applicable

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Not Applicable

VII. Other Record Keeping and Reporting Requirements

Not Applicable

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility – Not Applicable

B. Alternative Requirements – Not Applicable

C. Insignificant Activities – Not Applicable

D. Temporary Sources – Not Applicable

E. Short-Term Activities – Not Applicable

F. Compliance Schedule/Progress Reports

G. Emissions Trading – Not Applicable

H. Acid Rain Requirements – Not Applicable

I. Prevention of Accidental Releases – Not Applicable

J. Stratospheric Ozone Protection Requirements – Not Applicable

K. Pollution Prevention – Not Applicable

L. Specific Conditions – Not Applicable